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Chicago Police Department's Discipline Implementation, Options, and Recordkeeping

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Acronyms

BIA	Bureau of Internal Affairs
CBA	Collective bargaining agreement
ChIPPS	Chicago Integrated Personnel and Payroll Systems
CLEAR	Citizen Law Enforcement Analysis and Reporting
CMS	Case Management System
COPA	Civilian Office of Police Accountability
CPD	Chicago Police Department
CR	Complaint Register
CRMS	Complaint Record Management System
CTU	Centralized Timekeeping Unit
DHR	Department of Human Resources
DOF	Department of Finance
DOL	Department of Law
FMPS	Financial Management and Purchasing Systems
ILETSB	Illinois Law Enforcement Training and Standards Board
IMT	Independent Monitoring Team
LAD	Legal Affairs Division
MCC	Municipal Code of Chicago
OIG	City of Chicago Office of Inspector General
OPSA	Office of Public Safety Administration
OPSA-HR	Office of Public Safety Administration Human Resources Division

City of Chicago Office of Inspector General (OIG)

Chicago Police Department's (CPD) Discipline Implementation, Options, and Recordkeeping



Discipline for CPD sworn members should be progressive.

Discipline for new misconduct should be based on the final disciplinary actions the member has previously received.

OIG found:



Inconsistent Documentation of Disciplinary Actions

CPD failed to provide documentation for over half of finalized reprimands reported to OIG, and one third of reported finalized suspensions were not recorded in City databases.



Gaps in Coordination between Departments

CPD, the Office of Public Safety Administration (OPSA), and the Department of Human Resources all play roles in implementing discipline, but lack a shared understanding of reporting obligations.



Incomplete Records for "Options to Suspension"

"Options" allow a suspended CPD member to use paid time off in lieu of serving their unpaid suspension. Neither CPD nor OPSA have a complete record of the use of "Options."

Inaccurate and incomplete disciplinary histories:



- undermine public trust;
- impede CPD's ability to apply progressive discipline; and
- hinder CPD's ability to identify members at-risk of future misconduct and intervene.

I | Executive Summary

The Municipal Code of Chicago (MCC) Chapter 2-56 enables the City of Chicago Office of Inspector General (OIG) and sets out its powers and duties. Section 2-56-230(f) of this ordinance provides OIG's Public Safety section with the power to:

[R]eview and audit all sustained findings, disciplinary recommendations, and decisions made by the Police Department, the [Civilian Office of Police Accountability], and the Police Board, and any subsequent arbitration decisions, for the purpose of assessing trends and determining whether discipline is consistently and fairly applied, and determining whether final disciplinary decisions are being carried out.¹

Pursuant to this obligation, OIG reports on its inquiry into procedural consistency and fairness in the Chicago Police Department (CPD or the Department) disciplinary process; specifically, this report assesses whether finalized disciplinary actions imposed on CPD members are fully and consistently implemented (i.e., the necessary steps for the relevant disciplinary action have been completed) and recorded, and whether the exercise of "options to suspension" impacts the implementation, consistency, and fairness of final discipline. Options in lieu of suspension, or "options," allow a suspended member to use accrued paid time off in lieu of serving an unpaid suspension.

Final discipline refers to the disciplinary action imposed on CPD members after all investigation, review, and challenges have been completed or resolved. The four final discipline action types are: violation noted, reprimand, suspension, and separation. Implementation of these final discipline types requires varying processes and documentation, ranging from inputting a disciplinary action into a member's disciplinary record, to the halting of pay for the length of a suspension, to complete removal from payroll, or some combination thereof. In its assessment, OIG analyzed a CPD-provided list of all Sustained disciplinary actions against CPD members, finalized between April 13, 2016, and April 13, 2021.²

OIG found that CPD's recording of its implementation of final discipline in Citywide personnel and payroll databases was inconsistent (e.g., if a suspension has been implemented—in other words, a member has served a suspension—there ought to be data regarding the suspension in the member's personnel file along with an associated deduction of pay in the relevant Citywide databases, but OIG found that the necessary information in **both** databases was not reliably recorded), and was most incomplete for reprimands and suspensions. Although all the Department's reported finalized separations were appropriately recorded, CPD could not provide documentation for over half of the finalized reprimands and over a third of finalized suspensions that were reported to OIG. Inconsistent implementation and documentation of suspensions may be attributable to gaps in the coordination among City departments which is necessary to implement different types of final discipline. Whereas the implementation of reprimands is relatively straightforward and confined within CPD, the implementation of both suspensions and separations is more complicated and requires several layers and stages of administrative action. Current processes for implementing suspensions and separations involve multiple forms passing among

¹ Municipal Code of Chicago §2-56-230(f), accessed August 15, 2024, https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2599977#JD_2-56-230.

² The start of this five-year period was chosen to coincide with the beginning of former Superintendent Eddie Johnson's term. The end date of the analysis period was one full year before the start of fieldwork for this evaluation, with the intention of allowing sufficient time for discipline finalized at the end of the period to be implemented.

CPD's Bureau of Internal Affairs (BIA), the CPD Superintendent's office, the Office of Public Safety Administration (OPSA), the City's Department of Human Resources (DHR), the disciplined member, and the member's unit timekeeper. Further complicating the multi-department coordination is the fact that many of CPD's directives and forms related to the implementation of discipline do not reflect the creation of OPSA in 2019 nor do they enumerate OPSA's various responsibilities throughout the disciplinary process.³

In addition, OIG found that CPD, OPSA, and DHR do not share a common understanding of discipline reporting and recording obligations, jeopardizing the completeness and reliability of discipline records. Documentation for suspensions varied depending on suspension length. OIG found documentation for 42.9% of members who CPD specifically identified as "Suspended Over 30 Days" between April 13, 2015, and April 13, 2022.⁴ Comparatively, OIG found documentation for only 3.2% of CPD members with a discipline type of "Days Suspended"—which included suspensions of any length, both under and over 30 days—reported in CPD data. The inconsistency of documentation for suspensions not specifically labeled as over 30 days could be attributed to CPD, OPSA, and DHR's divergent understanding of reporting obligations and differing practices for recording such suspensions. OPSA reported to OIG that suspensions of less than 30 days are not entered into personnel records, whereas DHR stated that all suspensions of any length must be recorded. Further complicating the complete and accurate documentation of suspension is the granting and exercising of options. OIG could not confirm whether the use of options impacted the completeness of CPD's suspension documentation because CPD provided five completed options forms from the period of analysis; notably, neither CPD nor OPSA could provide any options forms completed before 2019.

OIG did not find any written guidance from CPD on coding resignations or retirements in lieu of discipline or while a member is under investigation. According to the City's "Policy Regarding Ineligibility for Rehire," members who retire or resign in lieu of discharge are deemed "ineligible for rehire," while members who retire or resign while they are the subject of an ongoing misconduct investigation are to be designated as "resigned or retired under inquiry." In addition, the policy states that if a former member with the "resigned or retired under inquiry" designation returns to City employment, then DHR—the agency tasked with maintaining the ineligible for rehire list—is prompted to notify the appropriate investigating agency that it may resume and complete its misconduct investigation, if it chooses. OIG found that for CPD members listed as having a discipline type of "resigned," over two thirds of such records lacked details on the nature or

³ OPSA was created in 2019 to take over the financial and human resources operations of all City public safety agencies, including CPD. Since 2019, only a few CPD directives that implicate such administrative functions have been revised to assign those duties to OPSA. For example, "Employee Resource E01-16: Leaves of Absence and Resignations" and "Special Order S08-01-08: Post-Investigation Log Number Procedures" describe OPSA's role in making notifications to the Illinois Law Enforcement Training Standards Board (ILETSB) when CPD members are separated from the Department, or they resign or retire with any open pending allegation(s). ILETSB is the state board responsible for certifying law enforcement personnel to perform law enforcement duties, such as making an arrest and carrying a firearm. ILETSB certification is required to serve as a law enforcement officer in Illinois. Although "S08-01-08" specifies "Office of Public Safety Administration Human [Resources Division's] (OPSA-HR)" duties for ILETSB notifications, it still ascribes administrative duties related to implementing suspensions (e.g., forwarding and processing forms) to the Department's "Human Resources Division" and "Finance Division."

⁴ This time period extends outside the bounds of OIG's scoped time period of April 13, 2016–April 13, 2021. Using the extended time period to check for suspensions served in payroll and personnel data takes into account the instances when a suspension finalized within the scoped time period may not have been served until after the scoped time period, or the served suspension may have begun during the scoped time period but concluded outside of that timeframe. OIG did not request or analyze any additional CPD discipline data for cases closed during this extended time frame.

disposition of members' end of employment. Because there are no restrictions on when members may resign or retire, the accurate coding of the disposition of a member's resignation or retirement is significant.

Finally, OIG found that neither CPD nor OPSA have clear criteria for the granting of options or the documentation of their use, and neither maintains a complete record of the exercise of options by CPD members. The lack of criteria guiding the granting of options risks members viewing the granting of options and the disciplinary process as wholly unfair or inconsistent. Other than reviewing individual personnel files for every member who has been issued a suspension, CPD has no comprehensive method for tracking the granting or use of options. Failure to document the use of options may impact the complete or accurate recording of suspensions. The use of options to fulfill part, or all, of an issued suspension may result in a lesser suspension or no suspension at all being recorded in a member's disciplinary history. Without documentation of the use of options in this case, there may not be a record of the actual length of the issued suspension, thereby obscuring a member's accurate disciplinary history.

Incomplete and inaccurate disciplinary records impact the application of progressive discipline and preclude CPD from analyzing trends in members' disciplinary histories that could help identify early intervention and training opportunities for members who consistently engage in patterns of misconduct—including as required by the consent decree entered in *Illinois v. Chicago*. Such gaps in disciplinary records increase the risk that CPD members who should face more severe penalties for subsequent misconduct do not, or more seriously, that those who should not continue to serve remain on duty.

Any risk that CPD members found to have committed misconduct might escape finalized discipline or might avoid such discipline from appearing in their personnel records threatens the credibility of and public trust in Chicago's police discipline and accountability system. To better ensure the complete and accurate implementation and documentation of final discipline, OIG made recommendations to CPD, OPSA, and DHR. Those recommendations, the findings upon which they are based, and the agencies' responses are reported herein.

II | OIG Ordinance Obligation

Section 2-56-230(f) of the Municipal Code of Chicago (MCC) empowers the Public Safety section of the Office of Inspector General (OIG) to:

[R]eview and audit all sustained findings, disciplinary recommendations, and decisions made by the Police Department, [COPA], and the Police Board, and any subsequent arbitration decisions, for the purpose of assessing trends and determining whether discipline is consistently and fairly applied, and determining whether final disciplinary decisions are being carried out.⁵

Fulfilling this ordinance obligation requires ongoing inquiry into the disciplinary process for Chicago Police Department (CPD or the Department) members and the final outcomes from disciplinary investigations.

OIG's first publication responsive to this ordinance obligation was a comprehensive descriptive account of the disciplinary process in a series of flowcharts, which depict all avenues of review, appeal, and implementation of discipline for CPD members. These flowcharts demonstrate how the disciplinary process and members' procedural rights vary depending on the discipline recommended by the investigating agency, the member's sworn or civilian status, and the member's rank or position. The descriptive flowcharts are available on OIG's website and are updated with changes to collective bargaining agreements (CBA), the MCC, CPD directives, and the other sources of authority that collectively govern the disciplinary process.⁶

OIG's second responsive publication was an evaluation of the procedural dimensions of consistency and fairness in the CPD disciplinary process.⁷ OIG found that Bureau of Internal Affairs (BIA), Civilian Office of Police Accountability (COPA), and Police Board policies do not provide clear and actionable guidance to ensure procedural consistency and fairness in the determination of discipline across misconduct investigations. OIG issued recommendations for corrective actions to the evaluated agencies and the Department of Law (DOL). OIG's third responsive publication—a follow-up evaluation of the aforementioned inquiry—assessed corrective actions taken by the agencies in response to its recommendations. The Police Board disagreed with OIG's recommendation and has not taken any responsive action, while OIG did not assess DOL's corrective actions because its recommendation to DOL is not yet applicable. OIG found that while both CPD and COPA have made efforts to formalize their respective documentation of aggravating and mitigating factors considered in determining recommended discipline, there is still no formal, cross-agency guidance on aligning their disciplinary recommendation processes.⁸

⁵ MCC §2-56-230(f).

⁶ City of Chicago Office of Inspector General, "Chicago Police Department Disciplinary Process Overview," accessed June 6, 2024, <https://igchicago.org/cpd-disciplinary-overview/>.

⁷ City of Chicago Office of Inspector General, "Fairness and Consistency in the Disciplinary Process for CPD Members," accessed May 13, 2024, <https://igchicago.org/wp-content/uploads/2023/08/Fairness-and-Consistency-in-the-Disciplinary-Process-for-Chicago-Police-Department-Members.pdf>.

⁸ City of Chicago Office of Inspector General, "Fairness and Consistency in the Disciplinary Process for Chicago Police Department Members Follow-Up," August 28, 2025, accessed September 9, 2025, <https://igchicago.org/wp-content/uploads/2025/08/Fairness-and-Consistency-in-Disciplinary-Process-for-CPD-Members-Follow-up.pdf>.

In this report, OIG evaluates whether finalized disciplinary actions imposed on CPD members are fully and consistently implemented and documented, and whether the exercise of options in lieu of suspension impact the implementation, consistency, and fairness of final discipline.

III | Background

A | The Chicago Police Department's Disciplinary Process

All CPD members, both sworn and civilian, are subject to a disciplinary process for allegations of misconduct. Cases against CPD members are initiated either by complaints (filed by members of the public) or notifications (filed by City agencies, including other CPD members). COPA and BIA conduct investigations and determine whether allegations made against a CPD member are Sustained, Not Sustained, Unfounded, or Exonerated.⁹ Figure 1 below describes these determinations, called “findings” in the CPD disciplinary process.

Figure 1: Overview of CPD Disciplinary Investigation Findings Types¹⁰

Finding	Description
Sustained	The allegation is supported by a preponderance of the evidence.
Not Sustained	There is insufficient evidence to either prove or disprove the allegation.
Unfounded	The allegation is false or not factual.
Exonerated	The incident occurred, but the actions of the accused were lawful and proper.

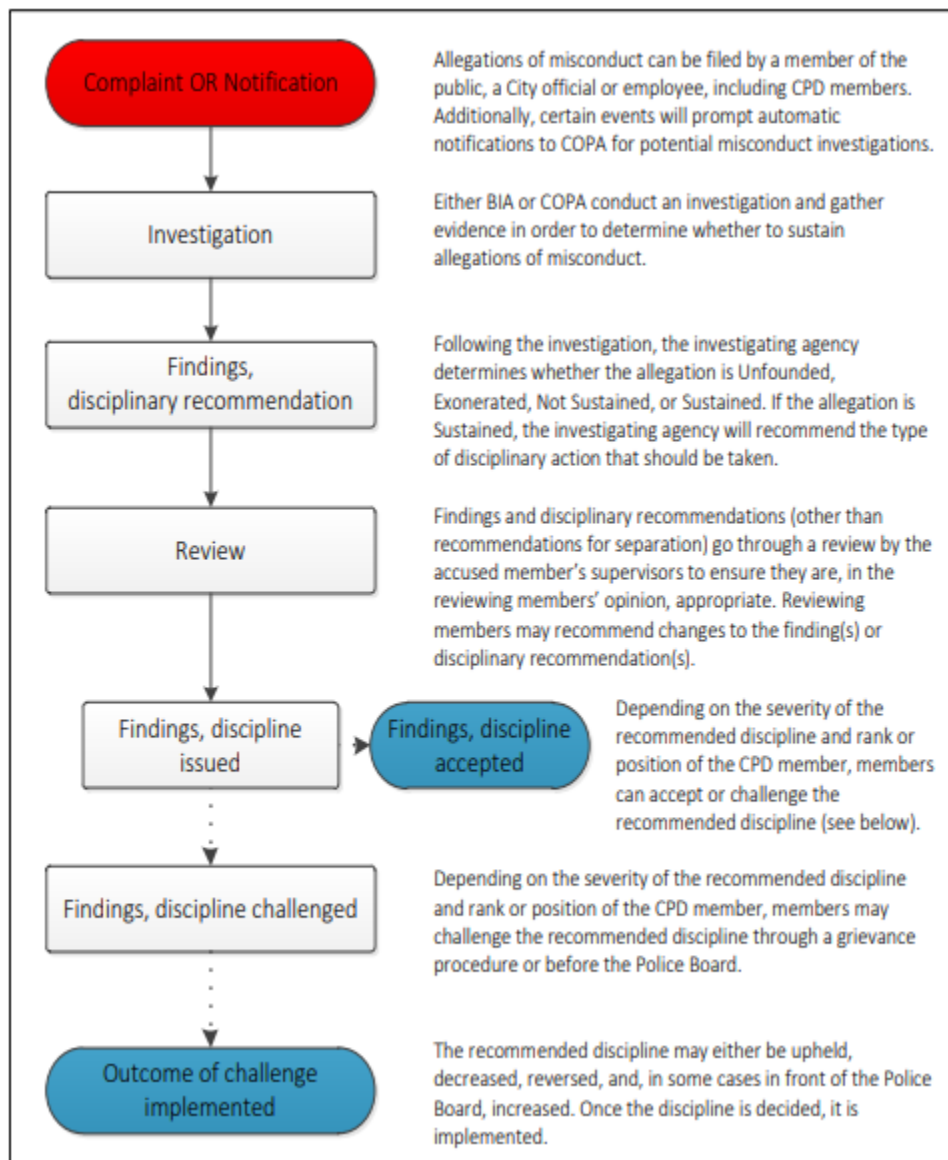
Source: OIG visualization.

Sustained cases lead to actions in which, following either the accused CPD member's acceptance of discipline or their exhaustion of the grievance process, final discipline is implemented. For that reason, Unfounded, Exonerated, and Not Sustained disciplinary findings are outside of the scope of this report. Figure 2 below illustrates an overview of the CPD disciplinary process, demonstrating the path from the initiation of a disciplinary investigation to the implementation of final discipline.

⁹ Chicago Police Department, “General Order G08-01-01: Complaint and Disciplinary Definitions,” December 31, 2022, accessed February 5, 2024, <https://directives.chicagopolice.org/#directive/public/6764>.

Under certain circumstances, OIG also conducts misconduct investigations of CPD members. See Municipal Code of Chicago §§2-56-0030(b), (j), accessed September 28, 2023, https://codelibrary.amlegal.com/codes/chicago/latest/chicago_il/0-0-0-2599840.

¹⁰ CPD, “General Order G08-01-01: Complaint and Disciplinary Definitions.”

Figure 2: Overview of CPD Disciplinary Process¹¹

Source: OIG visualization.¹²

¹¹ A comprehensive guide to CPD's disciplinary process can be found on OIG's website. See OIG's Chicago Police Department Disciplinary Process Overview flowcharts at <https://igchicago.org/about-the-office/our-office/public-safety-section/cpd-disciplinary-process-overview/>.

¹² In keeping with the objectivity and independence standards governing OIG's work, OIG describes but does not evaluate its own role in investigating misconduct allegations and recommending discipline in Sustained cases. Command Channel Review may be bypassed under certain circumstances, including: the recommended discipline of "Separation," a case that has gone through mediation, investigations with a finding other than Sustained that are confidential or sensitive in nature where the identity of the subject(s) would be compromised/scrutinized, "under limited extraordinary circumstances as determined by the Chief of BIA," and for cases that could otherwise be reviewed by OIG, the Labor Relations Division, or the Department of Law. For more information, see the Chicago Police Department's "Special Order S08-01-07: Command Channel Review," December 31, 2022, accessed February 5, 2024, <https://directives.chicagopolice.org/#directive/public/6975>.

B | Types of Final Disciplinary Actions

As described above, final discipline refers to the disciplinary action imposed on a CPD member following the completion of the CPD disciplinary process, i.e., the actual discipline given to a CPD member after all investigation, review, and challenges have been completed or resolved.

The distinction between “issued” or recommended discipline and “final” discipline actually handed down to a member is important. Although a CPD member may be issued discipline during the disciplinary process, the final form of that disciplinary action may change following a CPD member’s challenge to the issued discipline. For example, following a grievance procedure, an issued suspension of 30 days may be reduced to a final suspension of 5 days.¹³ In addition, it is common for investigations and disciplinary grievance processes to be lengthy.¹⁴ During investigations and grievance processes, a member may choose to resign or retire and consequently neither receive nor serve discipline.

Throughout this report, the terms “final discipline” and “final disciplinary action” are used interchangeably.

There are four types of final disciplinary actions that can be issued to a CPD member: violation noted, reprimand, suspension, and separation.¹⁵ Figure 3 lists each CPD disciplinary action type in order of increasing severity:

Figure 3: Types of CPD Final Disciplinary Actions¹⁶

Violation Noted	Violation noted is the least severe disciplinary action, wherein minor infractions are recorded in a CPD member’s disciplinary record, which is maintained by BIA.
Reprimand	Reprimands are a slightly more severe disciplinary action than a violation, wherein the CPD member is issued a form that is added to their disciplinary record.
Suspension	Suspensions are more serious than receiving a violation or a reprimand, and require more administrative effort to implement, among multiple City agencies.
Separation	Separation refers to being terminated from CPD employment. This is the most severe type of disciplinary action and involves multiple City agencies.

Source: OIG visualization.

C | Final Discipline Implementation

The implementation of final discipline can involve multiple agencies depending on the type of disciplinary action. Broadly, violations noted and reprimands are processed solely within CPD, while suspensions and separations require coordination among City departments. Figure 4 provides an overview of the departments involved in implementing final discipline for CPD members.

¹³ For more information on CPD’s grievance procedure, see OIG’s “Review of the Disciplinary Grievance Procedure for Chicago Police Department Members,” <https://igchicago.org/wp-content/uploads/2023/08/OIG-Review-of-the-Disciplinary-Grievance-Procedure-for-Chicago-Police-Department-Members.pdf>.

¹⁴ Grievance procedures differ for CPD members depending on their rank and the CBA they belong to.

¹⁵ Chicago Police Department, “Special Order S08-01-05: Conducting Log Number Investigations,” December 31, 2022, accessed January 2, 2025, <https://directives.chicagopolice.org/#directive/public/6857>.

¹⁶ CPD, “Special Order S08-01-05: Conducting Log Number Investigations.”

Figure 4: Departments Involved in CPD Disciplinary Implementation & Recordkeeping

Department	Department Description
Chicago Police Department (CPD)	CPD's Office of the Superintendent, Centralized Timekeeping Unit (CTU), CPD Districts, and the Advocate Section of BIA are each involved in the implementation of final discipline, depending on the type of discipline. ¹⁷ CPD implements violations noted and reprimands on its own, and coordinates with other City departments to implement suspensions and separations. ¹⁸
Office of Public Safety Administration (OPSA)	OPSA was created in 2019 to take over the financial and human resources operations of all City public safety agencies, including CPD. OPSA absorbed CPD's Finance Division and Human Resources Division. ¹⁹ OPSA is a separate City agency from CPD and is involved in implementing suspensions and separations. Among other things, the department processes CPD member timesheets before sending them to the Department of Human Resources and the Department of Finance.
Department of Human Resources (DHR)	DHR manages human resources responsibilities for all City of Chicago employees, including CPD members. ²⁰ DHR uses Chicago Integrated Personnel and Payroll Systems (ChIPPS) to maintain employee records and process payroll. DHR is a separate City department from CPD and is involved in implementing suspensions and separations. DHR verifies supporting paperwork for disciplinary actions, and it also maintains the City's ineligible for rehire list.
Department of Finance (DOF)	DOF manages all City of Chicago financial responsibilities. DOF uses Financial Management and Purchasing Systems (FMPS) to process City financial transactions, including but not limited to the disbursement and collection of City funds such as taxation, vendor contracts, payroll, and utilities. ²¹ DOF is a separate City department from CPD, and it adjusts payroll in cases of suspension and separation, when payments to members must be temporarily halted or ceased, respectively. ²²

Source: OIG visualization.

One area of multi-department overlap in implementing final discipline is the timekeeping and payroll processes. Four departments are involved in processing CPD member timekeeping and payroll: CPD, OPSA, DHR, and DOF. First, CPD unit timekeepers verify CPD member time and wage data and then send timesheets to OPSA. Next, OPSA processes timesheets and sends them to DHR

¹⁷ According to "General Order G08-01-01," the BIA Advocate Section of CPD ensures that the evidence supports investigative findings, and they brief the Superintendent on the merits of the investigation, and recommend the next steps in investigations. When a decision is made in regard to a member's retirement, resignation, disability leave of absence, indefinite suspension, or death the Superintendent's Centralized Time Keeping Unit 222 receives the original Time and Attendance Record (CPD-11.602). Final disciplinary cases often result in the retirement, resignation, suspension or leave of absence of an officer making the Time and Attendance Record or CPD 11.602 an important instance in which disciplinary information is recorded. For more information, see the Chicago Police Department's "Employee Resource E02-02: Payroll and Timekeeping – Attendance," January 7, 2019, accessed January 2, 2025, <https://directives.chicagopolice.org/#directive/public/6097>.

¹⁸ In accordance with Paragraph 550 of the consent decree, BIA publishes a quarterly report with aggregate data on misconduct investigations, including final dispositions and recommended discipline.

¹⁹ CPD's former Finance Division was comprised of an Accounting and Budgeting Section, a Payroll Section, and a Purchasing and Accounts Payable Section. CPD's former Human Resources Division was comprised of an Investigations Section, a Medical Section, a Random Drug Testing Section, an Ambassadors Section, a Career Development Section, an Awards Section, and an Employee Services and Assignment Section.

²⁰ See MCC § 2-74-020.

²¹ See MCC Chapter 2-32 Department of Finance.

²² See MCC § 2-32-030.

and DOF. Last, DHR records payroll information in ChIPPS and DOF then uses FMPS to issue payments to CPD members.

The agencies involved in processing timesheets and payroll create and store records needed to implement final discipline in several separate information systems. Figure 5 provides an overview of the different information systems used during the discipline implementation process.

Figure 5: Discipline Implementation & Recordkeeping Systems

System	System Description
CPD Forms	CPD forms are used to document and implement final disciplinary decisions. CPD forms are exchanged among CPD, DHR, and OPSA before being uploaded into city systems for review by DHR and/or DOF.
Case Management System (CMS)	Implemented in February 2019, CMS is CPD's current system used to document complaints against CPD members. BIA inputs CPD members' final disciplinary actions into CMS and CLEAR (see below). ²³
Citizen Law Enforcement Analysis and Reporting (CLEAR)	In totality, CLEAR is a collection of different technologies, dating from the early 2000s to present day. In the context of CPD member discipline, member information (such as Attendance and Assignment sheets) is accessible via CLEAR. BIA inputs CPD members' final disciplinary actions into CLEAR and CMS.
Chicago Integrated Personnel and Payroll Systems (ChIPPS)	ChIPPS is used to maintain employee records and process payroll for all City employees. City agencies enter preliminary "HR actions" (i.e., a change in position [such as a promotion] or a change in duty status [such as a suspension or taking leave]) into ChIPPS, which DHR reviews and finalizes. ChIPPS can also be used to view any City employees' employment history, including ineligible for rehire status, which is especially relevant for rehiring members who have a disciplinary history that may prevent them from being rehired by the City.
Financial Management and Purchasing Systems (FMPS)	FMPS is used by DOF to process City financial transactions and generally corresponds with CPD's—and all City agencies'—payroll records. ²⁴ FMPS can be used to view City employees' payroll records and is a system that consequently records final disciplinary status.

Source: OIG visualization.

The disciplinary implementation and recordkeeping processes and systems used differ among the four types of disciplinary actions. The following details the agencies and systems involved in implementing each of the four final disciplinary actions available for CPD members:

²³ Chicago Police Department, "Special Order S08-01-01: Log Number Case Management System," December 31, 2022, accessed January 2, 2025, <https://directives.chicagopolice.org/#directive/public/6775>.

²⁴ There are instances where data from CPD records differ from City data. For example, CPD and DHR may input overtime hours into their respective databases on different inputting schedules. That is, CPD and DHR do not always input hours at the same cadence.

1. Violations Noted

Violations noted are the least severe disciplinary action and are implemented by recording the CPD member's violation in their disciplinary record, maintained by BIA.²⁵ BIA inputs the violation into CMS and CLEAR.

2. Reprimands

Reprimands are a slightly more severe disciplinary action than a violation noted and are implemented by the Superintendent using the "CPD-44.101: Reprimand" form, which describes the "cause of [the] disciplinary action." The reprimand is added to and recorded by BIA in the CPD member's disciplinary record.²⁶ BIA inputs the reprimand into CMS and CLEAR.

3. Suspensions

Suspensions are a temporary, unpaid relief of duty. When the length of a member's suspension has been finalized after any applicable grievance process, BIA inputs the disciplinary case information into CMS and CLEAR. Because suspensions require both duty status and pay adjustments—with the potential for a deduction of health insurance benefits, depending on the length of the suspension—OPSA is also involved in the suspension implementation process. OPSA forwards a "CPD-44.102: Suspension Notification" form to the member's unit commanding officer.²⁷ The Suspension Notification form indicates the length of the member's suspension and whether the Superintendent has granted them "options to suspension."²⁸

"Options to suspension" or "options" allow a suspended CPD member to use their paid time off in lieu of serving their unpaid suspension.²⁹ For example, if a member is given a three-day suspension, they may be granted the right to forfeit up to three days of paid time off instead of serving the suspension. CPD directive "Special Order S08-01-08: Post-Investigation Log Number Procedures," does not specify any criteria for when options can or should be granted and gives the Superintendent total discretion over which CPD members are granted options in lieu of suspension.³⁰

²⁵ CPD, "Special Order S08-01-05: Conducting Log Number Investigations." Chicago Police Department, "Employee Resource E01-03: Personnel Records," January 7, 2019, accessed February 5, 2024, <https://directives.chicagopolice.org/#directive/public/6202>.

²⁶ Chicago Police Department, "CPD-44.101: Reprimand," August 2016, accessed February 5, 2024, <https://directives.chicagopolice.org/forms/CPD-44.101.pdf>.

CPD, "Employee Resource E01-03: Personnel Records."

²⁷ Chicago Police Department, "Special Order S08-01-08: Post-Investigation Log Number Procedures," February 28, 2025, accessed April 7, 2025, <https://directives.chicagopolice.org/#directive/public/6619>.

²⁸ Chicago Police Department, "CPD-44.102: Suspension Notification," August 2016, accessed February 5, 2024, <https://directives.chicagopolice.org/forms/CPD-44.102.pdf>.

²⁹ CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures."

³⁰ CPD policy uses the phrase "options to suspension" to describe the forfeiture of accrued paid time off as an alternative to serving an unpaid suspension. Throughout this report, OIG uses the more descriptive phrase "options in lieu of suspension" interchangeably with "options to suspension" and "options."

CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures."

The 2018 version of the Special Order—then titled "S08-01-04: Sustained Complaint Options"—included a note that the suspended member's unit commanding officer, any superior officer in their chain of command, the BIA Chief, or the Chief Administrator of COPA could recommend that the Superintendent **not** grant options in lieu of suspension. This note was taken out of the 2021 and current versions of the Special Order.

The Superintendent or their designee also has absolute discretion to permit members who have been granted options to satisfy all or part of their suspension through the use of their compensatory time, vacation days, furlough time, personal days, or some combination thereof.³¹ CPD policy does not specify whether the member or the Superintendent or their designee decides which type of time is to be forfeited. Throughout this report, OIG uses the term “accrued time” to broadly refer to CPD members’ compensatory time, vacation time, furlough, and personal days.

If a **CPD member is granted options**, OPSA will also prepare a “CPD-61.416: Election/Rejection of Options to Suspension” form which is used to indicate whether the CPD member elects to use or reject their granted options. The form is then sent to the CPD member’s unit.³² If the **CPD member elects to use options**, the CPD member indicates what kind and how much of their accrued time they want to use. The CPD member then submits the form to their unit timekeeper to certify the member’s balance of accrued time and indicate on the “Election/Rejection” form that they have enough accrued time before sending the form to OPSA. If the CPD member elects to use options, the CPD member must complete and submit the form within 72 hours and return it to OPSA.³³

If the **CPD member is granted options but opts not to exercise them**, the granting of options is considered rejected. If the member fails to complete the “Election/Rejection” form within 72 hours, the form is processed as if the options were rejected.³⁴ In either case, the CPD member’s unit commanding officer indicates “Options Rejected” on the form and returns it to OPSA.³⁵

According to CPD policy, when options have been rejected and the member accepts their suspension, the member’s unit timekeeper will record their duty status as “suspended” in the “CPD-11.602-A: Sworn Time and Attendance Record” form.³⁶ The suspended member’s unit timekeeper will also record the member’s non-pay status (e.g., suspension, summary punishment, leave of absence, unauthorized absence, or excused without pay) on the “CPD-61.209: Chicago Police Department Time Roll” form, which is sent to OPSA every pay period.³⁷

If the **CPD member is not granted options**, a “Suspension Notification” form is forwarded to their unit commanding officer.³⁸ The “Suspension Notification” form indicates the dates on which the suspension will be served.³⁹ If a member’s suspension is 30 days or longer, DHR halts premium payments on that member’s hospitalization insurance.⁴⁰

4. Separations

Separations refer to the termination of a CPD member and their removal from payroll. After separations have been adjudicated, the Legal Affairs Division (LAD) sends the member’s

³¹ CPD, “Special Order S08-01-08: Post-Investigation Log Number Procedures.”

³² CPD, “Special Order S08-01-08: Post-Investigation Log Number Procedures.”

³³ CPD, “Special Order S08-01-08: Post-Investigation Log Number Procedures.”

³⁴ CPD, “Special Order S08-01-08: Post-Investigation Log Number Procedures.”

³⁵ OIG was unable to determine how forms are stored or processed once returned to OPSA when options are rejected.

³⁶ Chicago Police Department, “Employee Resource E02-03-01: Sworn Time and Attendance Record,” October 1, 2020, accessed February 5, 2024, <https://directives.chicagopolice.org/#directive/public/6814>.

³⁷ Chicago Police Department, “Employee Resource E02-02-11: Time Roll Procedures,” May 20, 2016, accessed February 5, 2024, <https://directives.chicagopolice.org/#directive/public/6464>.

³⁸ CPD, “Special Order S08-01-08: Post-Investigation Log Number Procedures.”

³⁹ CPD, “CPD-44.102: Suspension Notification.”

⁴⁰ CPD, “Special Order S08-01-08: Post-Investigation Log Number Procedures.”

“Hospitalization insurance” is a type of insurance that covers the cost of medical care associated with hospital stays.

investigatory file to BIA's Advocate Section. BIA uploads the separated member's disciplinary file to CLEAR and CMS. OPSA then enters the separation Human Resources (HR) action into ChIPPS for DHR review. DHR reviews the HR action to ensure that the action has proper documentation before final approval, including a completed "PER 78: End of Employment" form for the separated CPD member.⁴¹ The member's commanding officer, supervisor, or a designee will conduct an end of employment interview and input the information into the form. The member is asked to sign the form, and the commanding officer, supervisor, or a designee provides a copy to the separated member and forwards the original form to "the Department's Human Resources Division." "Employee Resource E01-16: Leaves of Absence and Resignations" then notes that "OPSA-HR" will forward a copy of the form to DHR.⁴² DHR then processes the completed "PER 78" form, all additional documentation, and determines whether the separated CPD member is ineligible for rehire by the city.

According to DHR's "Policy Regarding Ineligibility for Rehire," DHR considers a CPD member ineligible for rehire if their termination from City employment results from one of the following:

- Discharge of any employee in violation of the City's Personnel Rules, and/or the Chicago Police Department's Rules and Regulations, and/or other departmental rules that govern conduct, as documented by the operating department at the time of discharge (except in cases where a former employee's discharge is due to their failure of any employment test unrelated to drug/alcohol use);
- Resignation or Retirement in lieu of discharge;⁴³
- Resignation or Retirement under inquiry and the investigation ultimately substantiates serious misconduct;⁴⁴ or
- It is discovered that the former employee engaged in serious misconduct while still employed with the City.⁴⁵

When a CPD member has been designated "ineligible for rehire" they should not be hired by any other City agency. If they have been designated as "ineligible for rehire," DHR notifies the separated CPD member of their designation and ensures that the designation and associated documentation is kept in the former employee's personnel file.⁴⁶ Following the member's last day on CPD payroll, the separated CPD member's unit commander forwards the member's "CPD-11.602: Sworn Time and Attendance Record" form to CPD's Centralized Timekeeping Unit for processing.⁴⁷

⁴¹ City of Chicago Department of Human Resources, "PER 78: End of Employment Form," April 30, 2024, accessed January 28, 2025, <https://directives.chicagopolice.org/forms/PER-78.pdf>.

⁴² Chicago Police Department, "Employee Resource E01-16: Leaves of Absence and Resignations," Section V.C.3, March 15, 2023, accessed April 24, 2024, <https://directives.chicagopolice.org/#directive/public/6137>.

⁴³ DHR defines "Resignation or Retirement in lieu of Discharge" as when an employee resigns or retires "after having been served with charges or having been otherwise informed by City officials, in a formal disciplinary setting, that the employee will be discharged; or after having been scheduled for a pre-disciplinary meeting to effectuate discharge." For more, see City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire," August 1, 2025, accessed August 11, 2025, https://www.chicago.gov/content/dam/city/depts/dhr/supp_info/POLICIES/IFR_Policy_08012025.pdf.

⁴⁴ DHR defines "Resigned or Retired Under Inquiry" as when an employee resigns or retires from City service while under investigation by an independent investigatory agency prior to the conclusion of that investigation. For more, see City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire."

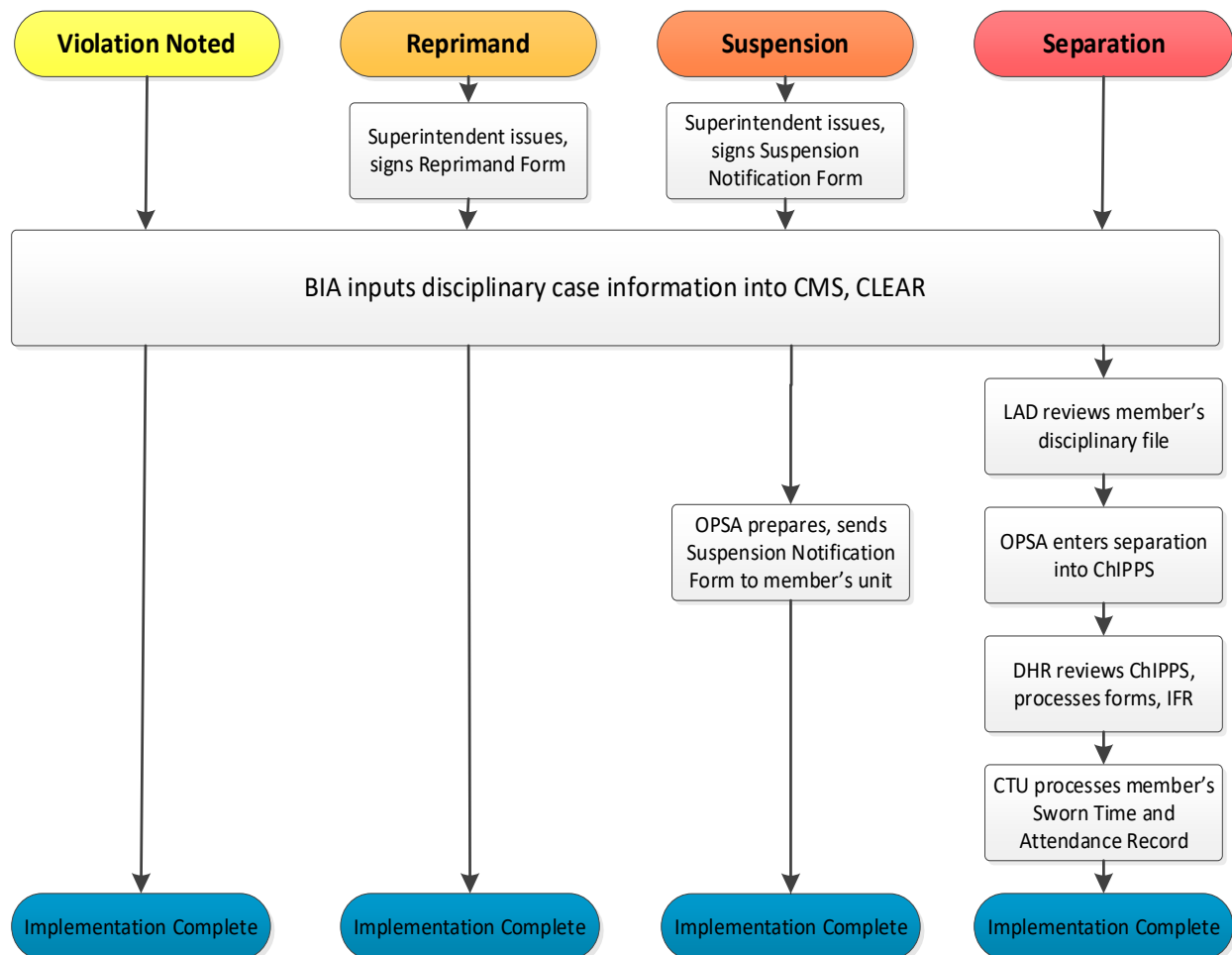
⁴⁵ DHR defines "serious misconduct" as conduct that is a violation of the Personnel Rules, and/or the Chicago Police Department's Rules and Regulations, and/or other departmental rules that govern conduct where such conduct is or may be deemed a reason to terminate an employee. For more, see City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire."

⁴⁶ City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire."

⁴⁷ CPD, "Employee Resource E01-16: Leaves of Absence and Resignations."

Figure 6 below illustrates a general comparative overview of final disciplinary actions.

Figure 6: Overview of Final Discipline Implementation Processes



Source: OIG visualization.

D | Options in Lieu of Suspension and Their Impact on Members

1. Importance of Recordkeeping

Since the granting and exercise of options can alter the actual length of time a suspended CPD member serves, options—and whether they are appropriately documented—can affect CPD members' continuous length of service. The continuous length of service determines a CPD member's pension payments. CBAs between sworn CPD members and the City stipulate that suspensions of more than 30 days be deducted when computing a member's continuous length of service.⁴⁸ If options are granted and exercised such that a suspension of more than 30 days is

⁴⁸ City of Chicago, "Agreement Between the City of Chicago and the Fraternal Order of Police Chicago Lodge No. 7 Effective July 1, 2012 through June 30, 2017," Section 23.1.B, accessed May 19, 2025,

lowered to a suspension of 25 days, but that change is not accurately documented, the CPD member's continuous service length may be negatively impacted.

2. Fairness and Consistency of Final Discipline

The allowance of options and the Superintendent's total discretion over when they are granted raises questions of fairness and consistency. The use of options implicates fairness and consistency in two important ways:

First, the use of options may have a minimizing effect on issued discipline, ultimately leading to questions around whether their use is fair. Suspension as a punishment provides two negative consequences to Department members found guilty of misconduct: forced time off (a social and professional burden) and loss of pay (a financial burden). However, the use of options removes some of the consequences of suspension as CPD members will not need to take time off to serve their discipline. The consequence of loss of pay is also reduced, as the member will not be impacted by such a consequence until they retire. Options come from unused paid time off that has been collected over the years, which CPD members would not receive until they cash out when they retire. General and specific deterrence theory in criminal law is an applicable lens from which to analyze the use of options in lieu of suspension. General deterrence theory posits that a general population (in this case CPD members) may be deterred from committing misconduct because they are aware that misconduct can result in discipline.⁴⁹ Alternatively, specific deterrence posits that individuals who commit misconduct, are investigated, and receive discipline will be deterred from committing future acts of misconduct.⁵⁰ The availability of the use of options in lieu of suspension makes punishment ambiguous and may influence the way members perceive committing future acts of misconduct themselves and the way they view misconduct committed by other members. Removing CPD members from duty further reinforces deterrence by simultaneously allowing other members to understand the gravity of committing misconduct. Furthermore, suspensions serve an incapacitation effect; a suspension forces a CPD member who has committed misconduct to take time off, rendering them at least temporarily unable to commit additional misconduct by literally removing them from the street.⁵¹ The availability of options may therefore diminish both the incapacitation and deterrence effects of punishment in the Department.

Second, the Superintendent's broad and total discretion to grant options risks giving rise to questions among CPD members about how that discretion is exercised and whether its exercise is fair and consistent. CPD members who receive suspensions but are not granted options—especially if other members with similar or identical Sustained misconduct are granted options—may perceive the Superintendent's granting of options without criteria for or transparency into the Superintendent's use of that discretion as unfair or inconsistent.

https://www.chicago.gov/content/dam/city/depts/dol/Collective%20Bargaining%20Agreement3/FOPCBA2012-2017_2.20.15.pdf.

⁴⁹ Kelli D. Tomlinson, "An Examination of Deterrence Theory: Where Do We Stand," *Federal Probation*, no.80, December 2016, 33-38, accessed August 7, 2025, https://www.uscourts.gov/sites/default/files/80_3_4_0.pdf.

⁵⁰ Tomlinson, "An Examination of Deterrence Theory," *Federal Probation*, 33.

⁵¹ Shawn D. Bushway, "Incapacitation," *Reforming Criminal Justice*, vol. 4, ed. Eric Luna, 2017, 37-54, accessed August 19, 2025, https://academyforjustice.asu.edu/wp-content/uploads/2022/04/Reforming-Criminal-Justice_Vol_4.pdf.

3. Loss of Accrued Time

The use of options also may also mean forfeiting compensatory time, vacation days, or personal days that a member could have used to take time off work. According to “Employee Resource E02-02-03: Payroll and Timekeeping – Holidays / Personal Days / Baby Furlough Days,” CPD members may request to use some forms of accrued time as “a day off.”⁵² A 2022 OIG report found that at least 1,190 members worked 11 or more consecutive days between April 1, 2022, and May 31, 2022 because of cancelled days off.⁵³ In July 2022, three CPD members committed suicide in one month, leading the Department’s former wellness adviser to publicly criticize the practice of cancelling days off.⁵⁴ The former wellness adviser described to the *Chicago Sun-Times* how “compounded levels of trauma” experienced by CPD members in combination with no opportunity for time away from work was linked to the development of sleep disorders, depression, and anxiety. In an interview with *Block Club Chicago*, a psychologist with the First Responders Wellness Center stated that time off work is important so CPD members can spend time with their families, process trauma, and simply rest and recuperate from the physical and mental toll of their jobs.⁵⁵ Forfeiting accrued time means that CPD members are forfeiting these opportunities for downtime, risking further compounding trauma and burnout.

⁵² Chicago Police Department, “Employee Resource E02-02-03: Payroll and Timekeeping – Holidays / Personal Days / Baby Furlough Days,” Section VI.A.1-2, April 6, 2023, accessed September 10, 2025, <https://directives.chicagopolice.org/#directive/public/6596>.

⁵³ City of Chicago Office of Inspector General, “Consecutive Days Worked by Chicago Police Department Members, April – May 2022,” August, 29, 2022, accessed April 2, 2025, <https://igchicago.org/wp-content/uploads/2022/08/Consecutive-Days-Worked-by-Chicago-Police-Department-Members-April-%E2%80%93-May-2022.pdf>.

⁵⁴ Tom Schuba, “After cluster of officer suicides, CPD’s former mental health adviser says city isn’t doing enough to help overworked cops,” *Chicago Sun-Times*, July 17, 2022, accessed April 2, 2025, <https://chicago.suntimes.com/crime/2022/7/17/23266721/officer-suicide-canceled-days-off-mental-health-chicago-police-cpd-alexa-james>.

⁵⁵ Ariel Parrella-Aureli and Mack Liederman, “Cops In Crisis: After 3 Officers Die Of Suicide In A Month, Colleagues Say They’ve Reached a ‘Breaking Point,’” *Block Club Chicago*, September 1, 2022, accessed April 2, 2025, <https://blockclubchicago.org/2022/07/20/cops-in-crisis-after-3-officers-die-of-suicide-in-a-month-colleagues-say-theyve-reached-a-breaking-point/>.

IV | Objectives, Scope, and Methodology

A | Objectives

The objectives of this inquiry were to determine if final discipline issued to CPD members was consistently implemented and documented (i.e., disciplinary actions are recorded in the appropriate personnel and payroll databases, as applicable, and/or documented in the appropriate supporting paperwork, as applicable), and to describe how the policy and practice of granting options in lieu of suspension has affected the implementation and consistency of final discipline. Final discipline refers to the disciplinary action imposed on CPD members following the completion or resolution of all investigation, review, and challenges.

B | Scope

The scope of this inquiry was limited to final discipline issued to CPD members between April 13, 2016, and April 13, 2021. The start of this five-year period was chosen to coincide with the beginning of former Superintendent Eddie Johnson's term. The end date of the analysis period was one full year before the start of fieldwork for this evaluation, with the intention of allowing sufficient time for discipline finalized at the end of the period to be implemented.

OIG asked CPD to provide a list of all disciplinary actions issued to CPD members that were Sustained and finalized between April 13, 2016, and April 13, 2021. CPD generated this list from data in the CMS, the Complaint Record Management System (CRMS), and CLEAR recordkeeping systems.⁵⁶ As these systems are meant to maintain investigation data for all misconduct investigations from intake to the final disciplinary decision, if any, OIG did not evaluate the accuracy and completeness of CPD's provided list.⁵⁷ However, OIG is aware of instances of Sustained and final discipline issued during the time period of analysis that do not appear in the data provided by CPD. Based on records received through a separate inquiry, OIG found 20 members who had either been terminated for cause or resigned in lieu of discipline between April 13, 2016, and April 13, 2021, who were not included in the final disciplinary actions list generated and provided by CPD. OIG is also aware of instances in which a CPD member who died before their penalty took effect and a member whose penalty was overturned by the Police Board were erroneously included in the provided list. In assessing the implementation and documentation of suspensions and separations, OIG did not evaluate the completeness of FMPS data against ChIPPS data. These are DOF and DHR databases, respectively, and are not maintained by CPD.

OIG excluded analysis of the timeliness of final implementation. In its review of relevant policies, OIG did not identify any existing City or CPD policy that codifies time-based requirements for when payroll and personnel databases must be updated to reflect the implementation of discipline.⁵⁸

⁵⁶ CRMS was the record system used to document complaints against CPD members prior to the implementation of CMS in February 2019. According to documentation provided by CPD, CRMS was used to produce records closed between April 13, 2016, and March 30, 2021, and CMS and CLEAR were used to produce records closed between December 30, 2019, through April 7, 2021. Cases that were closed after February 19, 2021, may appear in CRMS records and not in CMS because the complaints were opened prior to that date, when CRMS was still in use. As such, the records for these cases remained in CRMS until the cases were closed.

⁵⁷ Chicago Police Department, "Special Order S08-01-01: Log Number Case Management System," Section II.A.

⁵⁸ Per the FOP and PBPA's current respective CBAs, CPD's disciplinary investigations of sworn members must be concluded within 18 months from the date of the investigation opening unless CPD is able to show reasonable cause for

OIG was unable to analyze options to use accrued time in lieu of suspension that were granted and elected. OIG sent separate inquiries to CPD and OPSA for all completed “CPD-61.416: Election/Rejection of Options to Suspension” forms from the period of analysis; neither agency was able to provide responsive forms. Without these forms, OIG was unable to analyze the exercise of options or their impact on suspensions during the period of analysis.⁵⁹

C | Methodology

To inform all objectives, OIG reviewed:

- “General Order G08-01: Complaint and Disciplinary System;”
- “General Order G08-01-01: Complaint and Disciplinary Definitions;”
- “Special Order S08-01-01: Log Number Case Management System;”
- “Special Order S08-01-05: Conducting Log Number Investigations;”
- Current and previous versions of CPD’s policy governing post-misconduct investigation responsibilities and notifications, “Special Order S08-01-08: Post-Investigation Log Number Procedures;”
- “Employee Resource: E01-03: Personnel Records;”
- “Employee Resource: E01-16: Leaves of Absence and Resignations;”
- “Employee Resource: E02-02-11: Time Roll Procedures;”
- “Employee Resource: E02-02-03: Payroll and Timekeeping – Holidays / Personal Days / Baby Furlough Days;”
- “Employee Resource: E02-03-01: Sworn Time and Attendance Record;” and
- COPA’s policy guiding the procedure by which COPA investigators determine disciplinary and remedial recommendations, “Disciplinary and Remedial Recommendations.”

To inform all objectives, OIG:

- Requested and reviewed a list of all disciplinary actions for CPD members Sustained and finalized between the dates of April 13, 2016, and April 13, 2021.

To assess CPD’s implementation and documentation of reprimands, OIG:

- Requested all completed “CPD-44.101: Reprimand” forms submitted for disciplinary actions finalized between April 13, 2016, and April 13, 2021; and
- Compared unique investigations from the CPD-provided list resulting in a disciplinary action of “reprimand” against any CPD-provided completed “CPD-44.101: Reprimand” forms.

To assess CPD’s implementation and documentation of suspensions, OIG:

- Requested all completed “CPD-44.102: Suspension Notification” forms submitted for disciplinary actions finalized between April 13, 2016, and April 13, 2021;

why an investigation took longer than 18 months. In such situations, CPD has the burden for demonstrating the existence of reasonable cause and an arbitrator shall determine at a hearing whether there was a reasonable basis for the investigation to take longer than 18 months. CPD policies also specify when certain forms must be completed and returned by CPD members. For example, members who are granted options have 72 hours to complete a “CPD-61.416: Election/Rejection of Options to Suspension” form and return it to their unit of assignment.

⁵⁹ Examples of how the exercise of options may impact suspensions include the use of options to cover the entire duration of the suspension—meaning that an issued suspension was not actually served—and the use of options to shorten the actual suspension served.

- Compared unique investigations from the CPD-provided list resulting in a disciplinary action of “suspension” to FMPS and ChIPPS data recorded between April 13, 2015, and April 13, 2022;⁶⁰
- Sent written interrogatories to members of BIA’s Advocate and Records sections, OPSA’s managing deputy director of human resources, OPSA’s deputy director of payroll and timekeeping, and an OPSA timekeeper; and
- Interviewed a DHR deputy commissioner and an HR records specialist.

To assess CPD’s implementation and documentation of options in lieu of suspensions, OIG:

- Requested all completed “CPD-61.416: Election/Rejection of Options to Suspension” forms submitted for disciplinary actions finalized between April 13, 2016, and April 13, 2021;
- Sent written interrogatories to members of BIA’s Advocate and Records sections;
- Interviewed a member of BIA’s Advocate section; and
- Interviewed OPSA’s Managing Deputy Director of Human Resources and Deputy Director of Payroll and Timekeeping.

To assess CPD’s implementation and documentation of separations, OIG:

- Compared unique investigations from the CPD-provided list resulting in a disciplinary action of “separation” to FMPS and ChIPPS data recorded between April 13, 2015, and April 13, 2022;
- Sent a written interrogatory to OPSA’s managing deputy director of human resources;
- Interviewed a DHR deputy commissioner and an HR records specialist;
- Interviewed OPSA’s managing deputy director of human resources; and
- Reviewed the City of Chicago’s policy outlining the circumstances under which separated employees are to be designated as “ineligible for rehire,” “Policy Regarding Ineligibility for Rehire.”

D | Standards

OIG conducted this review in accordance with the Quality Standards for Inspections, Evaluations, and Reviews by Offices of Inspector General found in the Association of Inspectors General’s *Principles and Standards for Offices of Inspector General* (i.e., “The Green Book”).

E | Authority and Role

The authority to perform this inquiry is established in MCC §§ 2-56-030 and -230, which confer on OIG the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations, and, specifically, to review the operations of CPD and Chicago’s police accountability agencies. The role of OIG is to review City operations and make recommendations for improvement. City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity. Further, MCC § 2-56-230(f) requires OIG “to

⁶⁰ This time period extends outside the bounds of OIG’s scoped time period of April 13, 2016–April 13, 2021. Using the extended time period to check for suspensions served in FMPS and ChIPPS data takes into account the instances when a suspension finalized within the scoped time period may not have been served until after the scoped time period, or the served suspension may have begun during the scoped time period but concluded outside of that timeframe. OIG did not request or analyze any additional CPD discipline data for cases closed during this extended time frame.

review and audit all sustained findings, disciplinary recommendations, and decisions made by the Police Department, [COPA], and the Police Board, and any subsequent arbitration decisions, for the purpose of assessing trends and determining whether discipline is consistently and fairly applied and determining whether final disciplinary decisions are being carried out.”

V | Findings and Recommendations

To reach the below findings and recommendations, OIG asked CPD to provide a list of all disciplinary actions issued to CPD members that were Sustained and finalized between April 13, 2016, and April 13, 2021. OIG elected to analyze a five-year period of data, from the beginning of former CPD Superintendent Eddie Johnson's term, to analyze disciplinary trends across the tenures of multiple Superintendents.⁶¹ OIG began project fieldwork one year after the end of the five-year period of analysis, with the intent to allow time for discipline finalized at the end of the period of analysis to be implemented. For example, if a 60-day suspension was finalized and given to a CPD member on April 10, 2021, OIG would likely have been unable to find proof of discipline implementation (e.g., 60 days of docked pay) recorded in CPD and City databases on April 20, 2021. In that case, OIG would not be able to consider that disciplinary action to be implemented. Observing a one-year gap between discipline being handed down and the beginning of data analysis allowed OIG to conduct a more thorough and complete review of discipline during the period of analysis.

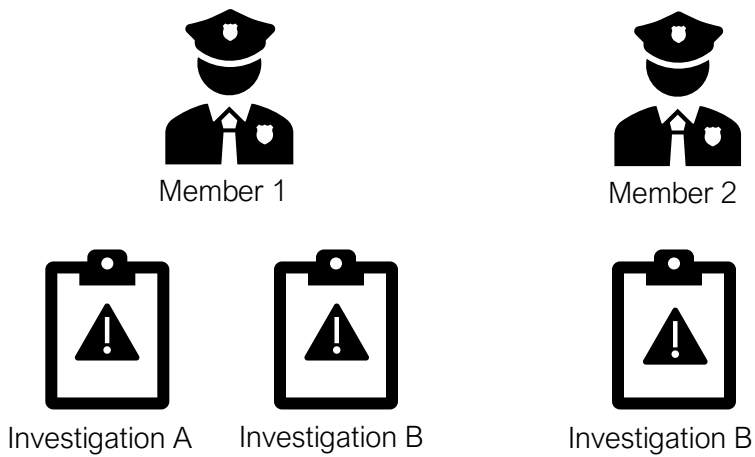
In the investigative process, Complaint Register (CR) numbers are assigned to complaints when they move beyond a preliminary investigation to a full investigation where the investigative agency intends to interview the member under investigation.⁶² CR numbers correspond to individual investigations into incidents, and *not* to individual members under investigation. If a complaint and subsequent investigation implicates multiple CPD members, then a common CR number for all such members is assigned to the investigation. Conversely, one CPD member may be accused of multiple different instances of misconduct, resulting in multiple CR numbers for a single member in CPD's disciplinary records.

OIG's analysis used unique investigations by CPD member as the unit of analysis. For example, as illustrated below in Figure 7, CPD Member 1 was a subject in both Investigation A and Investigation B, while CPD Member 2 was a subject only in Investigation B. OIG reported this as two distinct, unique investigations for Member 1 and one unique investigation for Member 2, for a total of three unique investigations by member.

⁶¹ Eddie Johnson served as Superintendent from April 2016 to December 2019, Charlie Beck served as interim Superintendent from December 2019 to April 2020, and David Brown served from April 2020 to March 2023 (past the time period of analysis).

⁶² CPD, "General Order G08-01-01: Complaint and Disciplinary Definitions."

Figure 7: Example Illustration of Unique Investigations by Member



Source: OIG analysis.

According to disciplinary records CPD provided to OIG, there were a total of 1,780 unique investigations by member between April 13, 2016, through April 13, 2021. Figure 8 below shows the distribution of disciplinary actions during the period of analysis.

Figure 8: Sustained and Final Disciplinary Actions by Discipline Description (Unique Investigations by Member) as Reported by CPD (April 13, 2016 – April 13, 2021)

Discipline Description	Members	Investigations by Member	% of Total Investigations by Member
Violation Noted	235	242	13.6%
Reprimand	396	407	22.9%
Suspension ⁶³	808	888	49.8%
Separation	54 ⁶⁴	56	3.1%
Resigned ⁶⁵	133	155	8.7%
Other ⁶⁶	31	32	1.8%
Totals	1,546⁶⁷	1,780	100.0%

Source: OIG analysis.

⁶³ All suspensions are included in this table as reported by CPD regardless of length. In the data provided by CPD, disciplinary records indicating a suspension included a Discipline/Penalty Code for both “Days Suspension” and “Suspended Over 30 Days.” OIG’s analysis found that although some suspensions over 30 days were labelled with the Discipline/Penalty Code “Suspended Over 30 Days,” some were not. See Finding 2 for additional information on suspension documentation.

⁶⁴ The data represented in Figure 8 is exactly as reported in the CPD-provided list of all disciplinary actions issued to members that were Sustained and finalized between April 13, 2016, and April 13, 2021. In OIG’s discussion of separations, OIG considers the separation of 52 members and not 54 as reported in this figure (see Finding 1C). This discrepancy (i.e., considering 52 members issued a separation versus 54 members reported to have been issued a separation) is a result of: (1) the death of a member who received a separation discipline and died before their separation could take effect, and (2) the erroneous inclusion of a member whose discipline was overturned by the Police Board in the list CPD provided to OIG.

⁶⁵ “Resigned” is not a CPD disciplinary action. Based on the data provided by CPD, it is not clear whether a member with the Discipline/Penalty code “Resigned” has resigned in lieu of a suspension or separation, or while under investigation. There are no restrictions on when members may retire or resign, and no restrictions on members choosing to retire or resign in lieu of discipline. See Finding 2 for more explanation of resignations and resignations in lieu of discipline.

⁶⁶ “Other” aggregates the following categories found in the raw data table provided to OIG by CPD: “Not Served,” “No Action Taken / Not Sustained / Exonerated / Unfounded,” “Deceased,” and “No Data Provided.” OIG requested from CPD a list of all Sustained and final disciplinary actions, which ought to exclude all “not sustained,” “exonerated,” or “unfounded” misconduct investigations.

⁶⁷ The total for this column is a count of unique members. This means that the total differs from the sum of the values in the column. For example, a member with a discipline of reprimand for one CR and a discipline of suspension for a different CR would only be counted once in the total of the “Members” column.

As violations noted are inputted only into the CMS and CLEAR databases and do not have accompanying or supplemental documentation that OIG may review to confirm discipline implementation, this evaluation does not include analysis of violations noted.

Finding 1: The City's documentation for implementation of final discipline for CPD members is inconsistent, and most incomplete for reprimands and suspensions.

CPD could not provide documentation for over one third of the final disciplinary actions that were issued during the requested five-year period. Citywide personnel records documenting separation decisions for CPD members were largely accurate, whereas CPD and Citywide records of reprimands and suspensions of CPD members, respectively, were incomplete. As shown in Figure 9 below, CPD did not provide documentation for roughly half of all issued reprimands, and one third of all issued suspensions were not recorded in either CPD or Citywide databases.

Figure 9: Documentation of Disciplinary Actions by Type of Final Disciplinary Action, 2016–2021

Final Disciplinary Action	Total Unique Investigations Per Member	Total Investigations Per Member with Disciplinary Documentation Produced	Percentage of Disciplinary Actions Documented ⁶⁸
Reprimand	407	196	48.2%
Suspension	888	595	67.0%
Separation	54 ⁶⁹	54	100%

Source: OIG analysis.

⁶⁸ The percentage of disciplinary actions that were not documented is not necessarily indicative that discipline was not **ever** documented. There exists a spectrum of reasons why OIG may not have received disciplinary documentation from CPD or OPSA, from discipline never having been documented in the first place to misplacement of existing documentation inhibiting its retrieval. This report describes several possibilities for explaining why some disciplinary actions were not documented, including agencies having differing understandings of reporting and documentation obligations resulting in incomplete documentation (see Finding 2) and the exercise of options obscuring accurate documentation of suspensions (see Finding 3).

⁶⁹ In the CPD-provided list of all disciplinary actions issued to members that were Sustained and finalized, OIG found two additional unique investigations per member on top of the 54 unique investigations per member listed in Figure 9. Neither of these two additional unique investigations per member had accompanying disciplinary actions recorded in ChIPPS. This discrepancy (56 total unique investigations per member that ended with a separation recommendation versus 54 total documented separations) is a result of: (1) the death of a member who received a separation discipline and died before their separation could take effect, and (2) the erroneous inclusion of a member whose discipline was overturned by the Police Board in the list CPD provided to OIG. In other words, the lack of documentation for these two cases does not represent any failure to implement separation discipline or failure to record the termination of a CPD member's employment in Citywide personnel records. Therefore, OIG considers only 54 total unique investigations per member in its analysis and considers 100% of unique investigations per member with Sustained and final separations provided by CPD as accounted for in Citywide personnel records.

A | CPD could not provide documentation for over half of the finalized reprimands it reported to OIG

OIG analyzed CPD's implementation of reprimands by counting documentation for each unique investigation per member to account for some CPD members receiving more than one reprimand during the period of analysis. In this case, it is important to know whether all reprimands issued to a member have been documented. If one issued reprimand has been documented but a separate issued reprimand for that same member has not been documented, then the member's disciplinary record is incomplete.

Reprimands are documented by CPD on the "CPD-44.101: Reprimand" form. As previously discussed, all documents and investigative materials related to misconduct investigations are kept in the CMS, which is maintained by BIA.⁷⁰ The implementation of suspensions and separations require both personnel and payroll adjustments, which are recorded, respectively, in ChIPPS and FMPS.

Based on a list of members with Sustained and final discipline between April 13, 2016, and April 13, 2021, provided by CPD, OIG identified a total of 407 unique investigations per member that resulted in a Sustained finding and final discipline of "reprimand." CPD was able to produce "CPD-44.101: Reprimand" forms for 196 of these investigations (48.2% of investigations per member, or 196 of 407). The lack of reprimand documentation may mean that a member did not receive a reprimand. The lack of reprimand documentation may also mean that a disciplined member received an oral reprimand and not a written one. CPD policy does not specify whether reprimands must be oral or written and therefore does not provide separate instructions for how to document an oral versus a written reprimand.⁷¹ In other words, CPD policy does not specify whether oral reprimands must also be documented on a "CPD-44.101: Reprimand" form, or if such forms are required only for written reprimands.

B | One third of CPD's reported finalized suspensions were not recorded in either the City's payroll or personnel databases

OIG analyzed CPD's implementation of suspensions by counting documentation for each unique investigation per member to account for the fact that some CPD members received more than one suspension during the period of analysis. It is important to ensure that all issued suspensions are appropriately documented, particularly to aid in the application of progressive discipline if necessary.

OIG found that suspensions issued to 288 CPD members between April 13, 2016, and April 13, 2021—one third of all suspensions issued during that time—were not recorded in Citywide databases used by CPD and other departments involved in recording final discipline. Based on data provided by CPD of Sustained and final suspensions issued to members between April 13, 2016,

⁷⁰ CPD, "Special Order S08-01-01: Log Number Case Management System."

⁷¹ The CBA between the City and sworn non-supervisory members does mention the use of oral reprimands, stating that, "[s]econd or even repeated infractions of minor rules may, but do not always, require increased punishment (particularly including loss of time or income) when an oral or written reprimand will suffice to achieve the goal of correcting improper behavior." City of Chicago, "Agreement Between the City of Chicago and the Fraternal Order of Police Chicago Lodge No. 7 Effective July 1, 2012 through June 30, 2017," Notice to Supervisors Regarding Progressive Discipline.

and April 13, 2021, OIG identified 888 unique investigations per member, involving 806 total CPD members. Because a suspension requires both that a member's pay be halted for the duration of the suspension and that the suspended member not be present for duty for that same period of time, an implemented suspension should be recorded in both the Citywide databases for payroll (FMPS) and personnel records (ChIPPS). Such records in FMPS and ChIPPS initiate the necessary administrative actions to implement the discipline. Two thirds (67.0%, or 595 of 888) of suspensions issued during this time were accounted for in Citywide databases. A deduction in pay due to suspension was indicated in FMPS for 562 investigations per member (63.3%, or 562 of 888). Ten unique investigations per member (1.1%, or 10 of 888) reflected an assignment status of "Disciplinary Suspension" in the relevant member's ChIPPS record at any time during the period of analysis. Additionally, 23 unique investigations per member (2.6%, or 23 of 888) were recorded in both FMPS and ChIPPS.⁷²

The lack of suspension documentation does not necessarily mean that a member did not serve their issued suspension. It is possible that a paperwork processing or data entry error occurred during the series of administrative measures necessary to implement and document a disciplinary action. For example, a signed—and therefore accepted and approved—"CPD-44.102: Suspension Notification" form might not have been passed from a member's commanding officer to OPSA, which would ultimately impede DOF and DHR's ability to record the suspension data in FMPS and ChIPPS, respectively. For more information on the interagency coordination necessary to implement final discipline, see subsection D.

It is also possible that suspension records are incomplete due to differing understandings of discipline reporting and recording obligations. For instance, OPSA and DHR have reported inconsistent practices for recording discipline to OIG. OPSA stated that suspensions of less than 30 days are not entered into ChIPPS, while DHR stated that suspensions of any length must be recorded. Therefore, it is possible that there are instances of suspensions under 30 days that have been served but may not appear in ChIPPS. For more information on differing understandings of discipline reporting and recording obligations among the actors involved in implementing final discipline, see Finding 2.

Additionally, it is possible that suspensions that were not recorded in either City database or were recorded in FMPS but not ChIPPS were instances when options were granted in lieu of discipline and the member elected to use them. For more information on the use and documentation of options and their impact on understanding final discipline implementation, see Finding 3.

It is also possible that the lack of suspension data recorded in either City database can simply mean that a member did not actually serve their issued suspension. Without consistent and complete documentation of issued suspensions, granted options, and the use or rejection of options, it is not possible to determine whether a suspension has been served in cases where suspension documentation is missing in either or both City databases.

⁷² The exercise of options in lieu of suspension may account for suspensions not being recorded in ChIPPS. In these instances, if a suspended CPD member is granted options and chooses to exercise them to satisfy the full length of their issued suspension, a suspension would not be indicated in ChIPPS. However, OIG was not able to confirm that the suspensions finalized during the period of analysis that were not recorded in ChIPPS was due to the exercise of options because neither CPD nor OPSA could provide complete records for the granting and exercise of options (See Finding 3).

C | All CPD's reported finalized separations were accurately recorded in ChIPPS

OIG analyzed CPD's implementation of separations by counting documentation for each member who was issued a separation, rather than each unique investigation per member that resulted in a separation. For example, even if a member has been issued two distinct separations as a result of two distinct incidents of misconduct, as long as the member is terminated for one incident then their employment is terminated regardless of the outcome of the other investigation.

OIG found that all 52 members reported by CPD to have been issued a separation during the period of analysis were correctly listed in Citywide personnel records as separated (i.e., a member's assignment status is listed as "Terminate Assignment" at any point between April 13, 2015, and April 13, 2022).

Throughout this report, OIG uses the terms "terminated for cause/termination for cause" and "separated/separation" interchangeably to indicate the involuntary end of a CPD member's employment. Members can be terminated for cause, or they can choose to voluntarily end their employment with CPD by resigning or retiring.⁷³ This distinction and the accurate recording of the nature or disposition of a member's end of employment in their personnel record is necessary to ensure that other City agencies can identify which members are ineligible for rehire (see Finding 2).

OIG found that terminations for cause were accurately reflected in ChIPPS for 82.7% of members (43 of 52) issued a separation. A complete and accurate record of a CPD member's separation requires both a ChIPPS assignment status of "Terminate Assignment"—indicating that their employment has ended—and an associated termination reason that indicates that the end of their employment was involuntary. Of the 52 recorded separations, the most common employment termination reason listed in ChIPPS was "Termination Disciplinary" (26 members). An additional 17 members with employment terminations recorded in ChIPPS had listed termination reasons related to disciplinary matters, such as "Resignation – Under Inquiry" and "Discharge."⁷⁴ Of the remaining nine separations, four CPD members had a termination reason of "Retirement" and five had a termination reason of "Resignation" with no additional designation. The complete and accurate recording of terminations ensures that payment is ceased for separated members.

⁷³ Members may be terminated for cause if they are the subject of a misconduct investigation that results in a Sustained finding. Members may also be terminated for cause if they have been decertified by ILETSB. ILETSB certification is required to serve as a law enforcement officer in Illinois. For example, law enforcement officers may be decertified for engaging in an act that would constitute a felony or misdemeanor, such as criminal sexual abuse or perjury.

⁷⁴ While a member with a "Resignation – Under Inquiry" termination reason would not be considered ineligible for rehire, such a tag would prompt DHR to notify the appropriate investigating agency should a member with that designation attempt to return to City employment. That investigating agency may resume and complete that member's misconduct investigation if it chooses. If the investigation finds that the former employee engaged in serious misconduct, then they are designated as "Ineligible for rehire." For more information on the coding of resignations and retirements for members in lieu of discipline or while under investigation, see Finding 2.

City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire," Section V.A.

D | Gaps in the interdepartmental coordination necessary to implement different types of final discipline may hinder consistent implementation of and accurate recordkeeping on issued discipline

The documentation disparity between separations and suspensions may be related to the relatively straightforward implementation of separations compared to suspensions. Once finalized, the implementation of a separation requires the member's duty status to be recorded as "Terminate Assignment" or "Resignation" in CHIPPS so they may be removed from payroll. Instances in which a member is in non-pay status are recorded by Unit timekeepers in the "CPD-61.209: Chicago Police Department Time Roll" form, which is then forwarded to OPSA.⁷⁵ By contrast, the implementation of a suspension requires several layers of administrative action, with multiple forms passing among OPSA, the Superintendent's office, the suspended member, the suspended member's unit commanding officer, and a unit timekeeper.⁷⁶ The involvement of multiple agencies at different stages may lead to more opportunities for processing errors.

Further complicating the multi-department coordination is the fact that CPD's directives and disciplinary forms do not reflect that certain of CPD's administrative duties—those previously performed by the Finance Division—were re-assigned to OPSA in 2019. OPSA was expressly created to carry out administrative functions in a separate entity wholly dedicated to "[handling] the paperwork" for the City's public safety agencies.⁷⁷ However, CPD's directives governing its disciplinary process—many of which have been updated after OPSA's creation—still assign administrative responsibilities to internal divisions and units and make no mention of OPSA's role in the disciplinary process. Additionally, CPD disciplinary forms continue to instruct members to forward copies to CPD's Finance Division or have sections designated for use by the Finance Division, which no longer exists.⁷⁸

The accurate reflection of duties throughout the disciplinary process in all directives and administrative forms is important both for CPD members receiving discipline and City departments responsible for implementing discipline. It should be clear for members which department receives and processes their completed forms, what administrative functions those forms serve, and which department is responsible for each function in the implementation of their discipline. Such clarity is

⁷⁵ CPD, "Employee Resource: E02-02-11: Time Roll Procedures," Section II.

The directive has not been updated since May 20, 2016, and still refers to the Finance Division. In 2019, OPSA was created to perform the administrative functions for Chicago's public safety agencies including CPD. Such administrative functions include completing financial reporting and managing payroll. OPSA's absorption of CPD's administrative functions encompasses approximately one year of OIG's period of analysis (2016-2021).

⁷⁶ CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures."

⁷⁷ City of Chicago, "Office of Public Safety Administration," accessed July 23, 2024, <https://www.chicago.gov/city/en/depts/opsa.html>.

⁷⁸ "Employee Resource E01-16: Leaves of Absence and Resignations" and "Special Order S08-01-08: Post-Investigation Log Number Procedures" describe OPSA's role in completing end of employment forms for departing CPD members and making notifications to ILETSB when CPD members are separated from the Department, or they resign or retire with any open pending allegation(s). Although "S08-01-08" specifies "Office of Public Safety Administration Human Resource [Division's] (OPSA-HR)" duties for ILETSB notifications, it still ascribes administrative duties related to implementing suspensions (e.g., forwarding and processing forms) to the Department's "Human Resources Division" and "Finance Division."

CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures."

Chicago Police Department, "CPD-44.102: Suspension Notification."

Chicago Police Department, "CPD-61.416: Election/Rejection of Options to Suspension."

also necessary so that all departments involved in recording and implementing discipline know and perform their specific roles in the disciplinary process. The accurate attribution of duties in policy also allows for accountability for the completion of all necessary steps in the disciplinary process. The lack of clarity on which department is responsible for specific steps increases the risk that necessary paperwork or administrative tasks in the disciplinary process are not properly completed, recorded, or retained.

E | Failure to maintain complete and accurate records for all types of discipline inhibits implementation of progressive discipline, identification of early intervention opportunities for members exhibiting at-risk behavior, and external oversight of discipline implementation

Inaccurate final discipline records may indicate that discipline was not actually implemented. The risk that CPD members who have sustained findings of misconduct resulting in discipline are able to continue to work without consequence circumvents the goals of discipline, endangers public confidence in the Department's systems of discipline and accountability, and weakens the accountability system's legitimacy.

For discipline that has been implemented, "Special Order S08-01-08: Post-Investigation Log Number Procedures" requires CPD to document all disciplinary decisions and discipline imposed in the accused member's administrative investigative file and in CMS.⁷⁹ In the context of implemented discipline, failure to maintain complete records of reprimands and suspensions impacts the ability of investigators to consider members' previous disciplinary history when recommending disciplinary action. Both BIA's and COPA's policies discuss progressive discipline as an active consideration when making disciplinary recommendations to CPD. According to "Special Order S08-01-05," subsequent acts of misconduct should result in increasing severity of discipline.⁸⁰ COPA's "Disciplinary and Remedial Recommendations" policy states that a "Department member's disciplinary history will be considered by COPA for the purposes of recommending discipline for a subsequent sustained finding."⁸¹ Without appropriate documentation and recordkeeping of final disciplinary decisions, Chicago's police accountability structures cannot ensure that the principle of progressive discipline is fair and consistent.⁸²

Incomplete and inaccurate disciplinary records for all types of discipline also inhibits CPD's ability to identify at-risk behavior by its members. The Department is mandated by the consent decree to identify early intervention and training opportunities for members who consistently engage in

⁷⁹ CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures."

⁸⁰ CPD, "Special Order S08-01-05: Conducting Log Number Investigations."

⁸¹ Civilian Office of Police Accountability, "Disciplinary and Remedial Recommendations," June 24, 2021, accessed February 6, 2024, https://www.chicagocopa.org/wp-content/uploads/2021/07/COPA-Policy_Disciplinary-and-Remedial_FINAL_2021-06-24.pdf.

⁸² Regarding progressive discipline, the CBA between the City and sworn CPD members states, "[t]here is some belief that a progressive system of discipline requires enhanced penalties no matter how insignificant the infraction. This is not correct. [Supervisors] are permitted and urged to use [their] judgment in determining the appropriate level of discipline. Officers in [the] Department are a valuable resource which should not be wasted or unduly restricted." City of Chicago, "Agreement Between the City of Chicago and the Fraternal Order of Police Chicago Lodge No. 7 Effective July 1, 2012 through June 30, 2017," Notice to Supervisors Regarding Progressive Discipline.

patterns of misconduct.⁸³ In response to this requirement, CPD launched the Officer Support System Pilot Program in June 2022. The program is meant to identify members who might be at-risk of being involved in future misconduct and providing them with appropriate support and intervention, such as mentoring or training.⁸⁴ It is not possible for the Department to accurately identify members who might be at-risk of future misconduct or patterns of misconduct without being able to analyze the full disciplinary history for all its members, especially all Sustained allegations of misconduct.

Further, the failure to record all suspension data in Citywide personnel and payroll databases independent of CPD's own records inhibits the opportunity for external oversight to ensure that suspensions are being properly implemented and served. Similarly, CPD members who have been terminated due to disciplinary issues—and who are therefore ineligible for rehire by the City—must have their separation accurately recorded so as not to be hired by another City agency.⁸⁵ There is no real deterrence to misconduct if CPD members are allowed to repeatedly commit acts of misconduct without adequate intervention (including separation) due to a lack of accurate disciplinary records. Allowing for repeated—and even escalating—acts of misconduct increases risk to the public, to CPD members, and to the City—and to the Department's critical relationship with the communities it serves.

| Recommendations

1. CPD, OPSC, and DHR should coordinate to maintain complete personnel and payroll records, as applicable, for all final discipline.
2. CPD, OPSC, and DHR should regularly audit and evaluate personnel and payroll records to ensure completeness and accuracy of disciplinary records in all applicable Citywide databases.
3. CPD should update its directives and forms to reflect that OPSC is responsible for administrative functions such as the retention of disciplinary documentation and disciplinary reporting to DHR.

⁸³ Consent Decree at ¶ 583, *State of Illinois v. City of Chicago*, No. 17-cv-6260 (N.D. Ill., Jan. 31, 2019). Independent Monitoring Team, "Independent Monitoring Report 11 (Reporting Period: July 1, 2024, through December 31, 2024)," April 11, 2025, accessed September 11, 2025, <https://cpdmonitoringteam.com/wp-content/uploads/2025/04/2025.04.11-Independent-Monitoring-Report-11-filed.pdf>.

In the eleventh reporting period, the Independent Monitoring Team (IMT)—the entity charged with assessing CPD's compliance with the consent decree entered in *Illinois v. Chicago*—found that CPD maintained Preliminary Compliance with this paragraph. Previously, during the ninth reporting period, the IMT found that no training was conducted for the pilot system with incoming supervisors, nor had the IMT been provided with a complete evaluation of the pilot. For more, see Independent Monitoring Team, "Independent Monitoring Report 9 (Reporting Period July 11, 2023, through December 31, 2023)," May 23, 2024, accessed September 11, 2025, <https://live-chicago-imt.pantheonsite.io/wp-content/uploads/2024/09/2024.05.23-Independent-Monitoring-Report-9-filed.pdf>.

⁸⁴ Chicago Police Department, "Department Notice D20-04: Officer Support System (OSS) – Pilot Program," June 30, 2022, accessed September 11, 2025, <https://directives.chicagopolice.org/#directive/public/6180>.

⁸⁵ City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire."

| Management Response

Chicago Police Department

1. *"CPD agrees that it should coordinate with OPSA to maintain complete personnel and payroll records and already does so. OIG evaluated a data set that ended on April 13, 2021, and this report does not acknowledge or evaluate CPD's implementation of the Case Management System (CMS). OIG's report does not reflect the strides that CPD has made in addressing the concerns raised by the OIG, especially in terms of communication between CPD and OPSA. Since 2021, CPD has streamlined communications processes with OPSA, which has been a positive step toward efficiency. CPD believes that, through the data sharing abilities developed with CMS, communication of disciplinary actions between CPD and OPSA already occurs. Moreover, the CMS is scalable and allows CPD to further refine and optimize the system should any communications issues arise. Through its Bureau of Internal Affairs (BIA), CPD communicates directly with OPSA, but does not directly communicate with DHR."*
2. *"CPD agrees that regular audits and evaluation of personnel and payroll records should occur. However, CPD does not maintain personnel or payroll records for its members. OPSA maintains these records. OPSA's Finance Division has access to final disciplinary decisions contained in CMS, which may be used to conduct this audit."*
3. *"CPD agrees with OIG's recommendation to update its directives and forms and will work with the Research and Development Section to review and update the relevant directives and forms to ensure that they accurately reflect OPSA's responsibilities."*

Please note that OPSA is not responsible for "retention of disciplinary documentation" as OPSA only retains forms CPD-44.102 (Suspension Notification) and CPD-61.416 (Election/Rejection of Options to Suspension).

CMS requires OPSA's Finance Division to upload CPD-44.102 (Suspension Notification) before closing their report in CMS. OPSA's Finance Division serves this form on the accused member. Only after service is complete and OPSA uploads the form into CMS is BIA able to view it."

Office of Public Safety Administration

1. *"OPSA appreciates and shares the OIG's commitment to ensuring that final disciplinary actions for CPD members are fully, consistently, and accurately implemented. This is an important area of public accountability, and we value any opportunity to strengthen processes that support transparency and fairness. Because of that importance, we believe the greatest opportunity for improvement lies in evaluating and refining current practices - not those reflected in significantly outdated data that does not capture the systems, structures, and workflows now in place. For example, the findings made in the instant report are based on an outdated data set (2016-2021) which began years before the implementation and consistent use of the Case Management System (2019) and the creation of OPSA (2020). The staleness of the data set is exacerbated by a three-year audit process that began as early as April 2022. As a result, the findings do not reflect the integration of OPSA into the broader public safety ecosystem and do not take into account*

processes that have been implemented within the last several years. It is likely the noted data deficiencies that are the basis of the OIG's findings would not exist, at least to the extent identified, if more current data and processes were examined by the OIG. With that said, OPSCA acknowledges there are limitations to the current CMS and ChIPPS systems that have prevented full reporting of CPD member suspensions under 30 days by OPSCA to DHR. Practically, reporting suspensions under 30 days to DHR through ChIPPS, a process that requires CPD member deactivation for the period of suspension, introduces administrative obligations and processing requirements for OPSCA and other City departments that would necessitate more resources to implement. Additionally, deactivating these members introduces a heightened risk of ancillary consequences such as lapses in member salary payments and the inability to meet the City's public safety staffing needs.

Because all suspension duration and exercise of options information is available in CMS, and because OPSCA has consistently reported suspensions over 30 days via ChIPPS in compliance with a reasonable interpretation of DHR's Ineligibility For Rehire policy (defining "serious misconduct" as interpreted in relation to Section 8.8 of the Collective Bargaining Agreement), the current environment likely does not support OPSCA's reporting of suspensions under 30 days to DHR via ChIPPS.

OPSCA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. We are committed to working with CPD and DHR to develop a solution that will streamline CPD member suspension reporting, provide transparency, and meet the needs of all parties."

2. "As described above, limitations exist in the current reporting environment. OPSCA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. As part of this exploration, we will prioritize the existence of a personnel and payroll audit feature to ensure completeness and accuracy of disciplinary records."

Department of Human Resources

1. "DHR agrees with OIG's recommendation that the City must maintain complete and accurate personnel and payroll records for all final disciplinary actions.

While DHR acknowledges that CBAs for sworn members include provisions that prevent suspensions of fewer than 31 days from constituting a break in service, **all suspensions—regardless of length—must be submitted to DHR as HR actions** to ensure proper documentation.

DHR's system is fully capable of recording suspensions under 31 days without triggering a break in service, thereby maintaining compliance with the applicable CBAs.

DHR ensures that CPD and OPSCA HR staff are aware of this requirement, and they should submit all suspension actions accordingly."

2. "DHR agrees with OIG's recommendation that regular audits should be conducted to ensure all disciplinary actions are properly documented in City systems.

However, DHR's ability to conduct these audits is contingent upon receiving complete and timely documentation from the operating departments. Specifically, CPD and OPSA must submit payroll registers and related documentation to DHR in order for audits to be performed effectively.

The request is that all relevant departments coordinate with DHR to ensure the necessary records are submitted on a regular basis. This collaboration is essential to maintaining accurate and complete disciplinary records across City databases."

Finding 2: CPD, OPSA, and DHR do not share a common understanding of discipline reporting and recording obligations, jeopardizing the completeness and reliability of discipline records.

Although the implementation of suspensions and terminations of employment requires coordination among CPD, OPSA, and DHR, there are no written policies defining each agency's specific responsibilities. As such, CPD, OPSA, and DHR have different reporting and recording practices, resulting in an incomplete record of disciplinary actions. These inconsistencies in practices range from misaligned instruction on coding resignation dispositions to conflicting guidance on documenting suspensions.

DHR's verification and consequent implementation of disciplinary actions depends on CPD's accurate and complete reporting of necessary duty status and payroll adjustments. BIA inputs members' final disciplinary case information into CMS and CLEAR and then, depending on the disciplinary action, OPSA is prompted to enter "HR actions" into ChIPPS and FMPS with the relevant supporting suspension or separation paperwork, which is then reviewed and verified by DHR personnel.

A | CPD and DHR have different practices for recording suspensions under 30 days

As reported in Finding 1, OIG found that 67.0% of the 888 unique investigations per CPD member with Sustained findings and final suspensions provided by CPD were accounted for in Citywide databases.⁸⁶ However, completeness of suspension records varied based on the City database and length of suspension.

Suspensions were more accurately recorded in FMPS than in ChIPPS. Based on data provided by CPD on Sustained and final member suspensions between April 13, 2016, and April 13, 2021, OIG found deductions in pay due to suspension in FMPS records for 65.9% (585 of 888) unique investigations. Based on the same data provided by CPD, OIG found that only 3.7% (33 of 888) of investigations resulting in a suspension had a duty status of "Disciplinary Suspension" recorded in ChIPPS data for the disciplined member at any time during the period of analysis.

⁸⁶ OIG analyzed CPD's implementation of suspensions by counting documentation for each unique investigation per member to account for the fact that some CPD members received more than one suspension during the time period of analysis. In this case, it is important to ensure that all issued suspensions are appropriately recorded, particularly to aid in the application of progressive discipline as necessary.

Figure 10: Suspensions in CPD Data Compared to ChIPPS and FMPS, by Unique Investigations

	No Suspension Recorded in ChIPPS	Suspension Recorded in ChIPPS	Total
No Suspension Recorded in FMPS	293 (33.0%)	10 (1.1%)	303 (34.1%)
Suspension Recorded in FMPS	562 (63.3%)	23 (2.6%)	585 (65.9%)
Total	855 (96.3%)	33 (3.7%)	888 (100.0%)

Source: OIG analysis.

Suspensions over 30 days were more accurately recorded in ChIPPS than suspensions of any length, both under and over 30 days. Among the 806 CPD members suspended between April 13, 2015, and April 13, 2022, CPD data specifically labeled 35 (4.3%, or 35 of 806 members) as “Suspended Over 30 Days.” Of the 35 members with this specific description in CPD data, 15 (42.9%, or 15 of 35) of those suspended members had a status of “Disciplinary Suspension” in ChIPPS during that timeframe.⁸⁷ Comparatively during that same time frame, of the 806 CPD members with a discipline type of “Days Suspended”—which included suspensions of any length, both under and over 30 days—reported in CPD data, only 26 (3.2%, or 26 of 806) had a status of “Disciplinary Suspension” in ChIPPS.

ChIPPS suspension records being incomplete based on duration of suspension may be due to DHR’s and CPD’s conflicting interpretations of suspension recording obligations. DHR reported to OIG that suspensions are entered into ChIPPS by OPSA’s human resources liaison(s) and that if a suspension does not appear in the database, it is because it was either not reported by CPD or OPSA, or it was removed following a grievance procedure. In the case of the latter, DHR would maintain documentation of the appeal. DHR additionally reported to OIG that all suspensions—regardless of length—are to be recorded in ChIPPS. In response to a written OIG interrogatory, a CPD timekeeper and an OPSA deputy director of payroll and timekeeping stated that suspensions of less than 30 days are not entered into ChIPPS, in accordance with the terms of sworn members’ CBAs. CBAs between the City and sworn CPD members’ four unions provide that suspensions of more than 30 days are to be deducted when computing a member’s continuous length of service, which affects pension calculations.⁸⁸ No CBA, however, bars CPD or OPSA from reporting suspensions of less than 30 days to DHR.

The use of options further complicates the recording of suspensions, especially in cases where options are granted to cover only part of a suspension and not the entire length. For example, if a member is given a 30-day suspension but is granted options to cover 25 days, then five days of unpaid suspension remain. Based on the inconsistent recordkeeping practices for suspensions of less than 30 days, the member’s suspension may not be recorded in ChIPPS but the five remaining

⁸⁷ This time period extends outside the bounds of OIG’s scoped time period of April 13, 2016–April 13, 2021. Using the extended time period to check for suspensions served in FMPS and ChIPPS data takes into account the instances when a suspension finalized within the scoped time period may not have been served until after the scoped time period, or the served suspension may have begun during the scoped time period but concluded outside of that timeframe. OIG did not request or analyze any additional CPD discipline data for cases closed during this extended time frame.

⁸⁸ The four unions represent supervisors (e.g., Sergeants and Lieutenants)—Police Benevolent and Protective Association of Illinois, Unit 156-Capitans, Police Benevolent and Protective Association of Illinois, Unit 156-Lieutenants, Police Benevolent and Protective Association of Illinois, Unit 156-Sergeants—and rank-and-file members (Fraternal Order of Police, Lodge 7).

days of unpaid suspension would be recorded in FMPS. As such, the use of options could result in conflicting records for the same suspension in ChIPPS and FMPS.

Suspensions specifically labeled in CPD data as being over 30 days may be better recorded because of their duration. This is significant for two reasons. First, suspension duration generally (although not always, given progressive discipline) correlates to the severity of the misconduct at issue, and longer suspensions may prompt more scrutiny of the documentation process. Second, CPD members' medical benefits are halted if they are suspended for more than 30 days.⁸⁹ A BIA Advocate reported to OIG that the families of suspended CPD members will also lose health benefits in those circumstances. DHR ceases paying for members' medical insurance premiums based on the suspension information they receive from CPD. Because longer suspensions introduce an additional administrative step to halt benefits on top of the necessary adjustments to duty status and payroll, it is possible that suspensions over 30 days may be more accurately and completely documented.

The lack of written guidance governing what CPD records and reports is especially critical given DHR's dependence on CPD's accurate and complete documentation of disciplinary actions. DHR personnel reported to OIG that their responsibility in implementing discipline is to confirm that the HR action submitted by CPD in ChIPPS is consistent with supporting documentation. For example, if CPD submits a five-day suspension as an HR action into ChIPPS, DHR would confirm that the necessary "CPD-44.102: Suspension Notification" form is attached and then review the form to verify that the suspension length listed matches the number entered in the system. Only then does DHR consider the HR action properly documented. DHR then implements the HR action in ChIPPS. Conversely, if CPD does not report a disciplinary action or does not provide supporting documentation for a disciplinary action, DHR cannot independently implement any HR action. DHR reported to OIG that if a finalized suspension does not appear in a member's ChIPPS work history, then neither CPD nor OPSA—which was created in 2019 to absorb such administrative responsibilities—had communicated said suspension to DHR.

B | There is no written guidance on coding resignations or retirements, in lieu of discipline or while a member is under investigation

Disciplinary records for CPD members who had been issued a separation but resigned before being terminated for cause were incomplete. Complete documentation of resignations includes both the recording of a member's termination of employment and the nature of their resignation. Accurate recording of resignations is significant because the City of Chicago's "Policy Regarding Ineligibility for Rehire" states that if a City employee resigns or retires in lieu of discharge, they are ineligible for rehire by the City.⁹⁰

The accurate coding of the disposition of a member's retirement or resignation while they are the subject of an ongoing misconduct investigation by an independent investigatory agency is significant because there are no restrictions on when a member may retire or resign—for instance, a member may retire or resign if they are the subject of an ongoing misconduct investigation, before

⁸⁹ CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures."

⁹⁰ City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire," Section IV.A.

the investigation has concluded or investigative findings have been issued.⁹¹ In these cases, per the “Policy Regarding Ineligibility for Rehire,” the independent investigatory agency conducting the investigation must submit a written request to the DHR Commissioner to ask that the member is designated as “Resigned or Retired Under Inquiry.” Such a designation by itself does not result in designating a former employee as “ineligible for rehire.” However, if a former employee with such a designation returns to City employment, then DHR is prompted to notify the appropriate investigating agency to resume and complete its misconduct investigation if it chooses. If the resumed investigation ultimately finds that the former employee engaged in “serious misconduct,” then the employee must be terminated for cause.⁹²

Based on CPD-provided data, between April 13, 2015, and April 13, 2021, there were 133 CPD members listed as having a discipline type of “Resigned,” which is not a disciplinary action.⁹³ Of these 133 members, OIG found that 129 had a duty status of “Terminate Assignment” in ChIPPS, meaning that nearly 97% of these members were appropriately recorded as inactive members (96.9%, or 129 of 133).⁹⁴ The “Terminate Assignment” duty status label denotes any employee whose employment has ended, regardless of disposition. That is, someone who was terminated for cause and someone who has retired would both have an associated duty status of “Terminate Assignment.”

Of the 129 members who resigned, OIG found that 35 were listed in ChIPPS with a termination reason that reflected something other than a wholly voluntary resignation (e.g., “Resignation – Under Inquiry,” “Retirement – Under Inquiry,” “Resignation – In Lieu of Discharge,” “Retirement – In Lieu of Discharge,” “Termination Disciplinary,” “Discharge”). Over two thirds of members listed as having a discipline type of “Resigned” had employment termination reasons that lacked any additional disposition (see Figure 11 below).

⁹¹ According to the City’s “Policy Regarding Ineligibility for Rehire,” if a member has already been provided the notice of charges or if they have been informed of an impending discharge or termination, then they are considered to have resigned or retired in lieu of discharge. For more information, see City of Chicago Department of Human Resources, “Policy Regarding Ineligibility for Rehire,” Section IV.A.3.

⁹² City of Chicago Department of Human Resources, “Policy Regarding Ineligibility for Rehire,” Section V.A.

⁹³ OIG analyzed CPD member resignations and retirements in lieu of discipline by counting documentation for each member who resigned or retired, and not for each unique investigation per member that resulted in a separation. If a member’s duty status is recorded in ChIPPS as terminated, the existence or status of any other investigations for alleged misconduct has no bearing on the documentation or implementation of their resignation or retirement.

⁹⁴ The remaining four employees who did not have a status of “Terminate Assignment,” all had a status of “Leave of Absence” from the Chicago Police Department on April 13, 2022, according to ChIPPS. Employees on a leave of absence are not considered active employees until they return from their leave.

Figure 11: Resignations in CPD Data as Recorded in ChIPPS

Termination Reason in ChIPPS	Members	% of Total Members
Retirement	61	45.9%
Resignation	31	23.3%
Resignation – Under Inquiry	11	8.3%
Retirement – Under Inquiry	8	6.0%
Resignation – In Lieu of Discharge	6	4.5%
Retirement – In Lieu of Discharge	6	4.5%
Termination Disciplinary	3	2.3%
Discharge	1	0.8%
Deceased	1	0.8%
Break in Service Non-Disciplinary	1	0.8%
Termination Not Recorded in ChIPPS	4	3.0%
Total	133	100.0%

Source: OIG analysis.

As noted above, the circumstances under which a member resigns or retires is significant and may impact their future employment with the City. However, there is no written guidance for coding CPD members who resign or retire during an investigation or in lieu of discipline. In an interview with OIG, a deputy director of human resources with OPSA stated that they have no set criteria against which to determine retirement or resignation disposition. Instead, OPSA will code resigning or retiring CPD members as doing so while under inquiry based on whether they have been relieved of police powers or whether the pending discipline is “serious in nature.” The deputy director defined “serious in nature” as a finalized or pending discipline of over 30 days suspension. They clarified that this is not a threshold based on written policy but one developed informally from working with CPD. The deputy director further explained that OPSA also retains the discretion to code members with finalized or pending discipline under 30 days or members who have been relieved of police powers as having retired or resigned under inquiry. The lack of written guidance for coding retirement or resignation disposition forces OPSA to exercise discretionary powers, which runs counter to the agency’s purpose as an administrative entity and risks inconsistent and unfair application, which may in turn damage CPD members’ trust in the disciplinary system. Such discretion has led to OPSA’s consideration of conditions which do not follow the terminology of the City’s “Policy Regarding Ineligibility for Rehire.” This risks incomplete or faulty implementation of the policy.

After they receive details from BIA on the nature of a member’s offense and the length of their suspension, OPSA personnel will code the disposition of any member who is retiring or resigning, either with no disposition or as under inquiry. This disposition, along with all relevant investigation

information and supporting documentation, is recorded in a memorandum and sent to DHR. DHR then inputs the HR action and any necessary coding in ChIPPS. A deputy commissioner with DHR confirmed this process, stating that either CPD or OPSA must report the disposition of a resignation to DHR in order for a member's standing to be reflected in ChIPPS.

C | The lack of written policies governing discipline reporting and recording obligations that are shared by CPD, OPSA, and DHR impedes the complete and accurate recording of final disciplinary actions

Without clear policies for when resignations or retirements should be coded as under inquiry or in lieu of discharge, CPD, OPSA, and DHR do not have a shared understanding of separation designations consistent with the language of the City's "Policy Regarding Ineligibility for Rehire." This precludes the City from consistently identifying and designating all members who have resigned or retired in lieu of discharge, or those who have resigned or retired under inquiry.⁹⁵ This lack of clear written policies hinders implementation of the "Policy Regarding Ineligibility for Rehire," resulting in a genuine risk that members with a history of disciplinary actions may be rehired by the City without proper scrutiny.

The lack of written policies identifying the suspension data that CPD is required to record and report to DHR has similar ramifications. Records of suspensions over 30 days were generally more accurate in FMPS because suspensions exceeding the 30-day threshold impact benefits and how continuous length of employment is measured toward pension calculations. However, DHR's data entry into ChIPPS for suspensions under 30 days was inaccurate and incomplete, in part because the data it received from CPD was incomplete. CPD and DHR's conflicting understandings of what must be recorded in members' disciplinary histories have resulted in incomplete recording of suspensions, and thus, incomplete and inaccurate disciplinary records.

The complexity of the discipline implementation process and the consequences of inaccurate records highlight the need for collaborative written policies involving DHR, OPSA, and CPD. The absence of such policies to safeguard the accuracy and completeness of data recording and reporting impacts the reliability of CPD's disciplinary records and the Department's ability to hold members accountable for misconduct.

| Recommendations

4. CPD and DHR should update their written policies regarding the recording of suspensions in Department and City databases, respectively, to clarify the circumstances under which suspensions are or are not recorded in databases, and to ensure consistency among City policies across departments.

⁹⁵ As previously described, an employee who has been designated as "Resigned or Retired Under Inquiry" does not result in designating a former employee as "ineligible for rehire," but the designation does prompt DHR to notify the appropriate investigating agency to resume and complete its misconduct investigation if it chooses. If the resumed investigation ultimately finds that the former employee engaged in "serious misconduct," then the employee must be terminated for cause and is considered "ineligible for rehire." For more information, see City of Chicago Department of Human Resources, "Policy Regarding Ineligibility for Rehire," Section V.A.

5. CPD, OPSA, and DHR should establish shared written criteria for all possible designations that can be assigned to CPD members who voluntarily resign and retire.
6. CPD and OPSA should ensure that all separation and resignation statuses (e.g., “Under Inquiry”, “In Lieu of Discharge”) are reported to DHR.
7. DHR should ensure that Assignment Statuses for CPD members who resign or are terminated include information on the disposition of such resignations and terminations.

| Management Response

Chicago Police Department

4. *“CPD already records all suspensions in CMS and reports these suspensions to OPSA through the CMS. However, a member’s complete disciplinary history does not directly correlate with the records in CMS.*

A Log Number will appear on a[n] member’s disciplinary history as soon as the member is named as an Accused, but the suspension details will not be linked to the disciplinary history until final action is taken.”

5. *“CPD agrees with this recommendation.*

It is important to note that BIA does not have access to, nor the ability to input data into, the City’s CHIPPS or FMPS systems.”

6. *“Through BIA, CPD already informs OPSA of a member’s status when OPSA notifies CPD that a member is leaving. It is then OPSA’s responsibility to communicate the member’s status to DHR. CPD put this process in place to ensure accurate and timely reporting, and CPD is committed to maintaining this system moving forward.”*

Office of Public Safety Administration

5. *“OPSA and DHR are aligned on shared written criteria as memorialized in DHR’s Ineligibility For Rehire Policy for all possible designations that can be assigned to CPD members who voluntarily resign and retire.”*
6. *“OPSA utilizes DHR’s End of Employment Form, which includes “In Lieu of Discharge” and “Under Inquiry” indicators for CPD employee separation and resignation statuses.”*

Department of Human Resources

4. *“DHR will be updating its written procedures to reinforce the requirement that **all suspensions—regardless of length—must be documented** in City systems.*

This update is intended to ensure clarity for both DHR records staff and operating departments, and to align with OIG’s recommendations for consistent and complete disciplinary recordkeeping.

Once finalized, the revised procedures will be distributed to all departments.”

5. *“DHR agrees with OIG’s recommendation and is committed to working collaboratively with CPD and OPSA to ensure compliance and consistency in disciplinary documentation and auditing.*

As part of this effort, DHR revised the Ineligible for Rehire Policy in August 2025 and distributed the updated policy to all departments. This revision reinforces the City’s commitment to maintaining accurate and complete employment records and supports the broader goals of transparency and accountability in personnel practices.”

7. *“DHR agrees with OIG’s recommendation regarding the importance of maintaining complete and accurate disciplinary records. However, it is the responsibility of CPD and OPSA to provide the necessary documentation to DHR.*

Once the required information is submitted, DHR will follow its standard procedures to ensure the disciplinary actions are properly recorded in the City’s personnel systems.

Timely and accurate submission of this information is essential to maintaining compliance and supporting the City’s commitment to transparency and accountability.”

Finding 3: CPD does not have clear criteria for granting options, and neither CPD nor OPSA maintains a complete record of the exercise of options by CPD members.

In response to an OIG request, CPD and OPSA produced documentation for five cases of options being used in lieu of suspension between April 13, 2016, and April 13, 2021. It is possible that during the time period of analysis, options were only granted for five cases out of the 888 total unique investigations per member that resulted in a final discipline of suspension. OIG is not able to determine the full extent of total options that were granted and total options that were used because CPD and OPSA were unable to produce any documentation for forms completed prior to 2019. Further, OIG found no written criteria for granting options or documenting their use. Short of reviewing individual personnel files for each member who has ever been issued a suspension, CPD has no comprehensive method for tracking the granting or use of options.

CPD's "Special Order S08-01-08: Post-Investigation Log Number Procedures" states, "Options to suspension may be granted by the Superintendent to a member who has been ordered suspended for a specified number of days," but includes no further specification on what criteria might be considered by the Superintendent in granting options.⁹⁶ Options data is captured on the "CPD-61.416: Election/Rejection of Options to Suspension" form ("Election/Rejection"), which indicates how many days a member has been suspended and whether the Superintendent has granted options for all or part of their suspension. Members may choose to reject the use of options, or they may elect to use them, indicating the amount and type of accrued time they will forfeit.⁹⁷ Regardless of whether a member elects to use or reject the options they have been granted, they are required to complete and return the "Election/Rejection" form to indicate their choice and complete the process of implementing a suspension.⁹⁸

OIG asked CPD to provide a complete listing of all CPD members who were granted options between April 13, 2016, and April 13, 2021, along with their corresponding "Election/Rejection" forms. CPD provided eight such forms for eight different members and stated that OPSA may have further documentation. OPSA was unable to provide any responsive documentation. According to a manager of police payroll at OPSA, prior to 2019, the exercise of options had been documented via handwritten notes on the physical forms, which were then stored in boxes at CPD headquarters and filed alphabetically by year; these forms were not recorded electronically. OPSA personnel

⁹⁶ CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures," Section V.C.

⁹⁷ CPD, "CPD-61.416: Election/Rejection of Options to Suspension."

⁹⁸ An accurate and complete recording of a member's duty status and the appropriate docking of their pay depends upon determining whether that member has elected to use the options they have been granted. If a member has been granted options to cover all of their suspension and they elect to use them, then the member does not serve the suspension and no pay is ever docked. If a member has been granted options to cover part of their suspension and they elect to do so, then the member serves the partial suspension and their pay is docked accordingly. If a member is granted options but chooses to reject them, they serve the suspension in full and their pay is docked accordingly.

further stated that they believe those boxes “may have been misplaced and/or mislabeled in the physical moves of staff and files during the OPSA transition [from CPD].”

OIG analyzed 364 “Suspension Notification” forms provided by CPD for suspensions finalized between April 13, 2016, and April 13, 2021. The “Suspension Notification” form includes a field for the Superintendent to indicate whether options are being granted to the member and another field for indicating what type(s) of accrued time the member is electing to forfeit and for what length of time. If a member elects to reject options and serve the suspension, there is a field that indicates when the suspension will commence and cease.⁹⁹ In its review, OIG found 92 forms that indicated that options were granted. As noted, whether or not a member elects to use their granted options, the “Election/Rejection” form must be completed and returned. Based on this requirement, OIG should have received more than eight “Election/Rejection” forms. OIG’s analysis was further complicated because a majority of the “Suspension Notification” forms provided by CPD were incomplete. That is, there was neither an indication that options were granted nor any indication that a suspension was actually served (i.e., the forms included dates when the suspension would have commenced and ceased). The extent of these incomplete forms would have hindered OIG’s ability to even conduct a backwards-inductive analysis of cases where options might have been granted. Due to CPD and OPSA’s inability to locate all responsive options forms and the incomplete state of their suspension documentation, OIG only included the eight provided options forms in this analysis.

The Superintendent’s office does not maintain a record independent of BIA regarding the granting and use of options, nor does it have written criteria for granting options. In an interview with OIG, a member of BIA’s Advocate Section stated that in their experience, there are several reasons why options may be granted by the Superintendent. Such reasons given were: if the violation occurred unintentionally; if the suspension is over 30 days, thereby causing the member and their family members to lose health benefits; if the misconduct is the result of following a superior’s orders; or if Department manpower is an issue. The Advocate further stated that former Superintendent David Brown’s Chief of Staff acted as the Superintendent’s designee in granting options for suspensions of less than five days.

Although the documentation and retention of “Election/Rejection” forms are generally addressed by CPD policies, there is no guidance regarding data entry into online systems, such as CMS and ChIPPS.¹⁰⁰ This lack of written policy is further complicated by the number of agencies involved in implementing options and the confusion amongst them regarding their respective responsibilities.

As explained above in Finding 2, DHR’s ability to implement HR actions in ChIPPS depends on complete and accurate reporting of disciplinary actions from CPD and OPSA. In an interview with OIG, DHR representatives stated that entering an HR action “requires submission of supplemental documentation” which, in the case of a suspension, would include the “CPD-44.102: Suspension Notification” form (“Suspension Notification”). The “Suspension Notification” form includes a check box labelled “Options to be Granted.”¹⁰¹ It is unclear if it is standard procedure for OPSA to upload the associated “Election/Rejection” form into ChIPPS when entering a suspension HR action wherein the “Suspension Notification” form’s “Options to be Granted” box is checked. That is,

⁹⁹ For more see Chicago Police Department, “CPD-44.102: Suspension Notification,” <https://directives.chicagopolice.org/forms/CPD-44.102.pdf>.

¹⁰⁰ CPD, “Special Order S08-01-08: Post-Investigation Log Number Procedures,” Section V.F.

¹⁰¹ CPD, “CPD-44.102: Suspension Notification.”

unless CPD or OPSA reports that a member has elected to use options in lieu of suspension as an HR action, DHR would not automatically check for that documentation. Further, DHR indicated it does not track compensatory time directly and would not be aware of the forfeiture of compensatory time in place of serving a suspension—in other words, the election of options—independent of such explicit notice from CPD.

The confusion between CPD and OPSA regarding their respective responsibilities in the discipline implementation process may stem from the 2019 establishment of OPSA, which consolidated financial and human resources functions for CPD, the Chicago Fire Department, and the Office of Emergency Management and Communications into the newly formed City department. Prior to OPSA's establishment in 2019, CPD's Finance Division should have maintained paper copies of all "Election/Rejection" forms, after which time all such forms should have been digitally stored in CMS.¹⁰² It is unclear whether the responsibility to maintain forms completed and retained prior to the establishment of OPSA resides with CPD or OPSA. Although OPSA was able to provide "Election/Rejection" forms processed by the agency dating back to 2021, as mentioned above, OPSA was unable to provide any responsive forms for granted and exercised options during the period of analysis.

The incomplete documentation of the election of options impedes the complete documentation of suspensions and prevents a comprehensive understanding of whether and how many suspensions were actually served. As reported in Finding 1, CPD could not provide documentation for suspensions issued to 288 distinct CPD members between April 13, 2016, and April 13, 2021, or 33.0% of suspensions issued during this time. CPD was able to produce eight "Election/Rejection" forms which included one form for a member who rejected the use of options and two forms that were completed before OIG's time period of analysis. The other forms were for five members who elected to use options and whose suspensions were not recorded in either FMPS or ChIPPS. In other words, these forms account for five of the 288 CPD members who were issued a suspension. It is unclear what proportion, if any, of the remaining 283 members whose suspensions are missing documentation can be attributed to the election of options in lieu of suspension.

CPD's inability to produce complete and accurate options documentation for the period of analysis is significant for two reasons. First, failure to document the use of options may also lead to failure to document the forfeiture of accrued time. When a member is granted options and they elect to use them, the completed "Election/Rejection" form is then returned to the member's unit timekeeper. The unit timekeeper certifies the member's balance of accrued time earned and forwards the form to OPSA for implementation.¹⁰³

Further complicating this process, according to a 2017 OIG audit, overtime and accrued time is manually recorded by CPD's 61 unit timekeepers on individual members' Time and Attendance sheets.¹⁰⁴ OIG confirmed in both written questions to a CPD timekeeper and OPSA deputy director of payroll and timekeeping in May 2022, and a February 2023 interview with two OPSA deputy directors (payroll and timekeeping, payroll), that individual unit timekeepers receive members'

¹⁰² CPD, "CPD-61.416: Election/Rejection of Options to Suspension."

¹⁰³ CPD, "Special Order S08-01-08: Post-Investigation Log Number Procedures," Section V.H.

The 2025 version of the Special Order still lists the Finance Division despite OPSA's creation in 2019 to absorb its administrative functions.

¹⁰⁴ City of Chicago Office of Inspector General, "CPD Overtime Controls Audit," Finding 2.C, pg. 40, October 3, 2017, accessed January 16, 2024, <https://igchicago.org/wp-content/uploads/2017/10/CPD-Overtime-Controls-Audit.pdf>.

“Suspension Notification” and options forms via email. Timekeepers then manually adjust members’ accrued time and complete, scan, and return the necessary forms to OPSA via email. CPD’s reliance on manual timekeeping done by 61 different individuals suggests that there could have been up to 61 different methods for recording overtime and accrued time. The lack of a standard system for such timekeeping poses the risk that members’ accrued time balance and the use of accrued time through election of options was not consistently or accurately recorded or deducted, respectively, during OIG’s period of analysis. Failure to appropriately deduct accrued time when options have been elected may mean that a member does not serve a suspension or incur a loss of accrued time. This undercuts both the social and financial burden of discipline. Such failure to deduct accrued time also has financial implications for CPD, which must pay out the balance of a member’s accrued time upon the end of their employment.

In its 2017 audit, OIG established that CPD did not have an automated system for tracking accrued time.¹⁰⁵ OPSA confirmed to OIG in a February 2023 interview that all CPD timecards and options forms completed prior to the creation of OPSA in 2019 exist in paper form, but that it began using an electronic application called Timesheet to track CPD members’ accrued time in September 2022. This means that during OIG’s time period of analysis of sustained and final discipline, there was likely no centralized reporting system for accessing information on accrued time, and no uniform process or format by which such time is recorded. Although accrued time is still entered into the Timesheet application and certified by CPD unit timekeepers, members’ attendance and time accrual and usage information can now be accessed electronically, which may help both agencies better identify errors in data entry.¹⁰⁶

Second, the incomplete documentation of options is significant because the use of options to fulfill part or all of an issued suspension may result in a lesser suspension or no suspension being recorded in a member’s disciplinary history. This, in turn, obscures the true representation of a member’s disciplinary history. For example, if options are granted for part of a suspension and a member elects to exercise them, CMS would reflect only the reduced suspension served, not the length of the original issued suspension. The lessening of issued discipline through the use of options may impede the application of progressive discipline for subsequent misconduct. It may also make it harder for CPD to identify members with one or more sustained findings of serious misconduct resulting in lengthy suspensions over 30 days. Inaccurate disciplinary records inhibit the Department’s ability to fully disclose the disciplinary histories of CPD members seeking external employment, present a risk that CPD members might be promoted without an accurate consideration of their disciplinary records, and may result in members who are not fit for CPD service being nonetheless allowed to remain on the job. These risks undermine the fairness of CPD’s disciplinary system and may erode public trust in the system’s ability to hold members accountable for misconduct. CPD members themselves may also lose trust and confidence in the fairness of the disciplinary system if they perceive that colleagues with Sustained and even repeating instances of misconduct are allowed to continue working without consequence.

Another issue that casts doubt on the fairness and consistency of CPD’s disciplinary system is the lack of criteria that guides the granting of options. CPD policy does not specify criteria for the granting of options, and a BIA Advocate reported to OIG that they were not aware of the Superintendent’s keeping any such written criteria. As a result, it is not clear whether options are

¹⁰⁵ City of Chicago Office of Inspector General, “CPD Overtime Controls Audit,” Finding 1.B #1, pg. 28-29.

¹⁰⁶ Chicago Police Department, “Department Notice D22-02: Automated Timesheet Application – Pilot Program,” September 4, 2022, accessed January 16, 2024, <https://directives.chicagopolice.org/#directive/public/6986>.

being granted based on defined criteria—written or otherwise—set by the Superintendent, wholly at the Superintendent’s personal discretion, or some combination of the two. It is also unclear whether such criteria persist across Superintendents or only apply for the Superintendent who sets them. For example, as noted above, a BIA Advocate reported to OIG that former Superintendent Brown considers granting options for suspensions of less than five days. It is not clear whether that unwritten criteria was only considered during former Superintendent Brown’s tenure, or it was a remnant of former Superintendents Johnson’s and/or Beck’s tenure.¹⁰⁷ As a result, CPD cannot compare cases of granted options against any formal standard to determine whether they are appropriately granted in accordance with policy. The lack of a formal standard also precludes analysis of the consistency and/or fairness in the practice of granting options, both within an individual Superintendent’s term and across the terms of different Superintendents. Transparency around what circumstances warrant the granting of options and when they are used affects both public and member perceptions of fairness and consistency of the disciplinary system. Members of the public want to know that CPD members accused of misconduct do bear accountability in some form. CPD members should have some certainty that misconduct results in discipline, and they should be able to trust that they will be treated fairly and consistently by the mechanisms of their disciplinary system.

The lack of transparency around the granting and use of options obscures both CPD’s implementation of suspensions and individual members’ disciplinary histories. This is especially concerning because the granting of options is not a transparent practice, and analysis or auditing of their use after the fact to ensure implementation is impossible. These concerns underscore the importance of complete and accurate documentation of when options in lieu of suspension have been granted and elected.

| Recommendations

8. CPD should update its policy governing options in lieu of suspension to include defined criteria for the granting of options.
9. OPSA should send DHR a record of when options have been exercised in lieu of suspension to ensure DHR has complete documentation of all Sustained and final disciplinary decisions for members’ disciplinary records.
10. CPD’s auditing of its personnel and payroll records should include analysis of both the granting of options and exercise or rejection of options, and such data should be made publicly available (see Recommendation 2).
11. CPD, OPSA, and DHR should establish a system to track DHR’s receipt of all documents necessary from CPD and/or OPSA to implement and code a disciplinary action.

¹⁰⁷ To understand how the Superintendent or the Superintendent’s designee determines when to exercise their discretion to grant options in lieu of suspension, OIG interviewed a BIA Advocate charged with presenting Sustained misconduct cases to the Superintendent. This Advocate stated that they could only speak to former Superintendent Brown’s practice for granting options as they had not worked directly with other Superintendents.

| Management Response

Chicago Police Department

8. *"CPD agrees with developing guidance for granting options but does not agree that criteria for granting options should be specifically defined in a policy. Consideration of mitigating and aggravating factors is at the discretion of the Superintendent of Police and the Chief of the Bureau of Internal Affairs, as already provided in policy. Additionally, the Consent Decree requires BIA to be consistent with COPA on these matters."*

The Superintendent's discretion to grant options is not arbitrary but instead follows a framework of factors that must be considered on a case-by-case basis."

10. *"CPD disagrees with this recommendation because CPD does not maintain personnel or payroll records for its members. OPSA maintains these records."*

As for the 'Options Granted' status, it is captured in CMS through a 'Yes/No' radio button, ensuring that the information is recorded clearly and consistently."

11. *"CPD already provides this information to OPSA, which is responsible for notifying DHR. CPD does not have direct contact with DHR regarding these matters."*

Office of Public Safety Administration

9. *"The exercise of options in lieu of suspension is available in CMS in an "Options Granted" field. As described above, limitations exist in the current reporting environment. OPSA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. As part of this exploration, we will prioritize the existence of a reporting feature for the exercise of options in lieu of suspension."*

11. *"As described above, limitations exist in the current reporting environment. OPSA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. As part of this exploration, we will prioritize the existence of a system to track DHR's receipt of all documents necessary from OPSA to implement and code a disciplinary action."*

Department of Human Resources

11. *"DHR currently maintains a document management system to support the documentation of disciplinary actions. However, this system is not currently configured to interface with the systems used by the CPD and the OPSA."*

To enable seamless data sharing and improve audit capabilities, funding must be secured to support the development of system interfaces between DHR, CPD, and OPSA. This integration is essential to ensure timely, accurate, and complete documentation of all disciplinary actions across the relevant departments."

DHR is committed to working with all stakeholders to identify funding opportunities and move this initiative forward.”

VI | Conclusion

The current process for recording and implementing Sustained and final disciplinary actions for CPD members involves multiple City departments, each of which share responsibility in the disciplinary process but are guided by their own distinct policies and procedures. These differing policies and procedures complicate the implementation and complete recording of final discipline. Further, the Superintendent's ability to grant the use of options complicates the implementation and recording of discipline by adding layers of time tracking and paperwork processing across those different agencies. Moreover, the granting and exercising of options by CPD members lacks defined policies or procedures to ensure fair and consistent application.

Taken together, these conditions create opportunities for administrative errors and inconsistencies. As a result, CPD and City databases do not currently have complete or accurate documentation of disciplinary actions for Department members with Sustained and final discipline. Stakeholders—including CPD, the public, and OIG—are unable to determine with confidence that finalized discipline is in fact being implemented as intended.

The risk that gaps in coordination and failures of recordkeeping might allow CPD members who have committed misconduct to avoid discipline or avoid their personnel records' reflecting their actual disciplinary history is a threat to the credibility of Chicago's police discipline and accountability system. Additionally, inaccurate and incomplete disciplinary histories hinder the Department's ability to identify members who are at-risk of future misconduct and intervene. Shortcomings in the consistent and well-recorded implementation of discipline undermine trust in Chicago's police accountability system and, accordingly, OIG urges the implementation of the recommendations offered herein.

Appendix A | Chicago Police Department Response



Brandon Johnson
Mayor

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

Larry Snelling
Superintendent of Police

December 4, 2025

VIA ELECTRONIC MAIL

Ms. Tobar Richardson (TRichardson@igchicago.org)
Deputy Inspector General for Public Safety
City of Chicago Office of Inspector General
231 South LaSalle Street
Chicago, Illinois 60604

Re: Chicago Police Department's Discipline Implementation, Options, and Recordkeeping

Dear Public Safety Inspector General Richardson:

The Chicago Police Department ("CPD") appreciated the opportunity to discuss the Public Safety Inspector General's findings concerning the above-named report ("Report"). CPD provides the following comments in addition to those contained in the Management Response Form to address additional issues with the Report.

The Report relies on old data that does not reflect the current state of how CPD maintains police disciplinary records, as well as how CPD communicates that information to the Office of Public Safety Administration ("OPSA"). Page 20 of the Report states that PSIG's inquiry was limited to discipline imposed between April 13, 2016, and April 13, 2021. This period pre-dates CPD's full implementation of the Case Management System ("CMS"), which is how CPD's Bureau of Internal Affairs ("BIA") now maintains disciplinary history data for its members. Since the Report relies on old data, it is not an accurate reflection of how CPD maintains disciplinary data or communicates that data to OPSA.

Before CMS, BIA used a database called Auto-CR in the CLEAR Application to document its investigations. When Auto-CR was developed, it was created as a siloed architecture specifically for use by BIA (then known as the Internal Affairs Division) and the Civilian Office of Police Accountability. Since CMS went live in 2019, it has been in a state of continuous development and refinement. In its current state, it allows the OPSA Finance Division, which is responsible for implementing member suspensions and deducting from a member's paycheck accordingly, to upload documents evidencing that a suspension has been fulfilled. The OPSA Finance Division receives a prompt in CMS to complete this task before it is able to change a status from "Pending Finance" to "Finance Complete." CMS also records whether a member is granted options, which is captured in the "CCR Console" of CMS.

Using options to fulfill part, or all, of a member's suspension does not obscure a member's disciplinary history. A member's "Sustained Complaints History Report" reflects the total number of suspension days a member receives, regardless of whether the Department granted options, as well as when the member served the suspension. Granting a member options cannot be construed as a lesser suspension or no suspension at all. Forfeiting compensatory time, personal days, or other earned time still penalizes a member because it affects annual sellbacks and day-to-day requests to use elective time.

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The Report also makes reference to the Department's use of reprimands and incorrectly notes that reprimands are recorded on form CPD-44.101. The Department discontinued the use of CPD-44.101. In addition, PSIG's analysis incorrectly concludes that a reprimand can be oral in nature. CPD only issues oral admonishments, which do not constitute formal discipline. A reprimand as a disciplinary action is a formal penalty, and if issued requires that the member receive formal notification. In addition, the reprimand is recorded in the member's disciplinary history.

As reflected above and in CPD's Management Response Form, the Report does not accurately portray the current state of CPD's discipline implementation, options, and recordkeeping. CPD has made substantial progress in these areas since 2021, which the Report does not reflect or evaluate. CPD will continue its work to improve and refine the Case Management System.

Best regards,



Scott Spears
General Counsel
Chicago Police Department

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Management Response Form

Inquiry Title and Number: Chicago Police Department's Discipline Implementation, Options, and Recordkeeping, C2022-000032522

Department Name: Chicago Police Department

Commissioner/Department Head: Superintendent Larry Snelling

Date: December 4, 2025

OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
1. CPD, OPSA, and DHR should coordinate to maintain complete personnel and payroll records, as applicable, for all final discipline.	CPD agrees that it should coordinate with OPSA to maintain complete personnel and payroll records and already does so. OIG evaluated a data set that ended on April 13, 2021, and this report does not acknowledge or evaluate CPD's implementation of the Case Management System (CMS). OIG's report does not reflect the strides that CPD has made in addressing the concerns raised by the OIG, especially in terms of communication between	Implemented	N/A

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
	CPD and OPSA. Since 2021, CPD has streamlined communications processes with OPSA, which has been a positive step toward efficiency. CPD believes that, through the data sharing abilities developed with CMS, communication of disciplinary actions between CPD and OPSA already occurs. Moreover, the CMS is scalable and allows CPD to further refine and optimize the system should any communications issues arise. Through its Bureau of Internal Affairs (BIA), CPD communicates directly with OPSA, but does not directly communicate with DHR.		
2. CPD, OPSA, and DHR should regularly audit and evaluate personnel and payroll records to ensure completeness and accuracy of disciplinary records in all applicable Citywide databases.	CPD agrees that regular audits and evaluation of personnel and payroll records should occur. However, CPD does not maintain personnel or payroll records for its members. OPSA maintains these records. OPSA's Finance Division has access to final disciplinary decisions contained in CMS, which may be used to conduct this audit.	N/A	N/A

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
3. CPD should update its directives and forms to reflect that OPSA is responsible for administrative functions such as the retention of disciplinary documentation and disciplinary reporting to DHR.	<p>CPD agrees with OIG's recommendation to update its directives and forms and will work with the Research and Development Section to review and update the relevant directives and forms to ensure that they accurately reflect OPSA's responsibilities.</p> <p>Please note that OPSA is not responsible for "retention of disciplinary documentation" as OPSA only retains forms CPD-44.102 (Suspension Notification) and CPD-61.416 (Election/Rejection of Options to Suspension).</p> <p>CMS requires OPSA's Finance Division to upload CPD-44.102 (Suspension Notification) before closing their report in CMS. OPSA's Finance Division serves this form on the accused member. Only after service is complete and OPSA uploads the form into CMS is BIA able to view it.</p>	CPD estimates six months; however this time may need to be extended depending on external approvals that may be needed to make changes to the relevant directives.	CPD's BIA and R&D Section

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
4. CPD and DHR should update their written policies regarding the recording of suspensions in Department and City databases, respectively, to clarify the circumstances under which suspensions are or are not recorded in databases, and to ensure consistency among City policies across departments.	<p>CPD already records all suspensions in CMS and reports these suspensions to OPSA through the CMS. However, a member's complete disciplinary history does not directly correlate with the records in CMS.</p> <p>A Log Number will appear on an member's disciplinary history as soon as the member is named as an Accused, but the suspension details will not be linked to the disciplinary history until final action is taken.</p>	N/A	N/A
5. CPD, OPSA, and DHR should establish shared written criteria for all possible designations that can be assigned to CPD members who voluntarily resign and retire.	<p>CPD agrees with this recommendation.</p> <p>It is important to note that BIA does not have access to, nor the ability to input data into, the City's CHIPPS or FMPS systems.</p>	CPD estimates six months; however this time may need to be extended depending on external approvals that may be needed to make changes	CPD's BIA and R&D Section

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
		to the relevant directives.	

OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
6. CPD and OPSA should ensure that all separation and resignation statuses (e.g., "Under Inquiry", "In Lieu of Discharge") are reported to DHR.	Through BIA, CPD already informs OPSA of a member's status when OPSA notifies CPD that a member is leaving. It is then OPSA's responsibility to communicate the member's status to DHR. CPD put this process in place to ensure accurate and timely reporting, and CPD is committed to maintaining this system moving forward.	N/A	N/A

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
8. CPD should update its policy governing options in lieu of suspension to include defined criteria for the granting of options.	<p>CPD agrees with developing guidance for granting options but does not agree that criteria for granting options should be specifically defined in a policy. Consideration of mitigating and aggravating factors is at the discretion of the Superintendent of Police and the Chief of the Bureau of Internal Affairs, as already provided in policy. Additionally, the Consent Decree requires BIA to be consistent with COPA on these matters.</p> <p>The Superintendent's discretion to grant options is not arbitrary but instead follows a framework of factors that must be considered on a case-by-case basis.</p>	CPD estimates six months; however this time may need to be extended depending on external approvals that may be needed to make changes to the relevant directives.	CPD's BIA and R&D Section

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
10. CPD's auditing of its personnel and payroll records should include analysis of both the granting of options and exercise or rejection of options, and such data should be made publicly available (see Recommendation 2).	CPD disagrees with this recommendation because CPD does not maintain personnel or payroll records for its members. OPSA maintains these records. As for the 'Options Granted' status, it is captured in CMS through a 'Yes/No' radio button, ensuring that the information is recorded clearly and consistently.	N/A	N/A
11. CPD, OPSA, and DHR should establish a system to track DHR's receipt of all documents necessary from CPD and/or OPSA to implement and code a disciplinary action.	CPD already provides this information to OPSA, which is responsible for notifying DHR. CPD does not have direct contact with DHR regarding these matters.	N/A	N/A

Appendix B | Office of Public Safety Administration Response



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Management Response Form

Inquiry Title and Number: Chicago Police Department's Discipline Implementation, Options, and Recordkeeping, C2022-000032522

Department Name: Office of Public Safety Administration

Commissioner/Department Head: Era Patterson, Executive Director

Date: October 27, 2025

OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
1. CPD, OPSA, and DHR should coordinate to maintain complete personnel and payroll records, as applicable, for all final discipline.	OPSA appreciates and shares the OIG's commitment to ensuring that final disciplinary actions for CPD members are fully, consistently, and accurately implemented. This is an important area of public accountability, and we value any opportunity to strengthen processes that support transparency and fairness. Because of that importance, we believe the greatest opportunity for improvement lies in evaluating and refining	Ongoing	All

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
	current practices - not those reflected in significantly outdated data that does not capture the systems, structures, and workflows now in place. For example, the findings made in the instant report are based on an outdated data set (2016-2021) which began years before the implementation and consistent use of the Case Management System (2019) and the creation of OPSA (2020). The staleness of the data set is exacerbated by a three-year audit process that began as early as April 2022. As a result, the findings do not reflect the integration of OPSA into the broader public safety ecosystem and do not take into account processes that have been implemented within the last several years. It is likely the noted data deficiencies that are the basis of the OIG's findings would not exist, at least to the extent identified, if more current data and processes were examined by the OIG.		

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
	<p>With that said, OPSA acknowledges there are limitations to the current CMS and ChIPPS systems that have prevented full reporting of CPD member suspensions under 30 days by OPSA to DHR. Practically, reporting suspensions under 30 days to DHR through ChIPPS, a process that requires CPD member deactivation for the period of suspension, introduces administrative obligations and processing requirements for OPSA and other City departments that would necessitate more resources to implement. Additionally, deactivating these members introduces a heightened risk of ancillary consequences such as lapses in member salary payments and the inability to meet the City's public safety staffing needs.</p> <p>Because all suspension duration and exercise of options information is available in CMS, and because OPSA has consistently reported suspensions over 30 days via ChIPPS in compliance</p>		

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
	<p>with a reasonable interpretation of DHR's Ineligibility For Rehire policy (defining "serious misconduct" as interpreted in relation to Section 8.8 of the Collective Bargaining Agreement), the current environment likely does not support OPSA's reporting of suspensions under 30 days to DHR via ChIPPS.</p> <p>OPSA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. We are committed to working with CPD and DHR to develop a solution that will streamline CPD member suspension reporting, provide transparency, and meet the needs of all parties.</p>		

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
2. CPD, OPSA, and DHR should regularly audit and evaluate personnel and payroll records to ensure completeness and accuracy of disciplinary records in all applicable Citywide databases.	As described above, limitations exist in the current reporting environment. OPSA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. As part of this exploration, we will prioritize the existence of a personnel and payroll audit feature to ensure completeness and accuracy of disciplinary records.	Ongoing	All
5. CPD, OPSA, and DHR should establish shared written criteria for all possible designations that can be assigned to CPD members who voluntarily resign and retire.	OPSA and DHR are aligned on shared written criteria as memorialized in DHR's Ineligibility For Rehire Policy for all possible designations that can be assigned to CPD members who voluntarily resign and retire.	N/A - already implemented	All

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
6. CPD and OPSA should ensure that all separation and resignation statuses (e.g., "Under Inquiry", "In Lieu of Discharge") are reported to DHR.	OPSA utilizes DHR's End of Employment Form, which includes "In Lieu of Discharge" and "Under Inquiry" indicators for CPD employee separation and resignation statuses.	N/A - already implemented	OPSA
9. OPSA should send DHR a record of when options have been exercised in lieu of suspension to ensure DHR has complete documentation of all Sustained and final disciplinary decisions for members' disciplinary records.	The exercise of options in lieu of suspension is available in CMS in an "Options Granted" field. As described above, limitations exist in the current reporting environment. OPSA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. As part of this exploration, we will prioritize the existence of a reporting feature for the exercise of options in lieu of suspension.	Ongoing	OPSA and DHR

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
11. CPD, OPSA, and DHR should establish a system to track DHR's receipt of all documents necessary from CPD and/or OPSA to implement and code a disciplinary action.	As described above, limitations exist in the current reporting environment. OPSA continues to actively explore technological solutions to integrate all CPD human resource reporting functionalities and bridge gaps in existing processes. As part of this exploration, we will prioritize the existence of a system to track DHR's receipt of all documents necessary from OPSA to implement and code a disciplinary action.	Ongoing	All

Appendix C | Department of Human Resources Response



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Management Response Form

Inquiry Title and Number: Chicago Police Department's Discipline Implementation, Options, and Recordkeeping, C2022-000032522

Department Name: Department of Human Resources

Commissioner/Department Head: Sandra Blakemore, Commissioner

Date: December 03, 2025

OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
1. CPD, OPSA, and DHR should coordinate to maintain complete personnel and payroll records, as applicable, for all final discipline.	DHR agrees with OIG's recommendation that the City must maintain complete and accurate personnel and payroll records for all final disciplinary actions. While DHR acknowledges that CBAs for sworn members include provisions that prevent suspensions of fewer than 31 days from constituting a break in service, all suspensions—	Immediately.	CPD and OPSA are the primary leads on this, with DHR closing out the process in CHIPPS once it receives the HR action and supporting disciplinary

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
	<p>regardless of length—must be submitted to DHR as HR actions to ensure proper documentation.</p> <p>DHR's system is fully capable of recording suspensions under 31 days without triggering a break in service, thereby maintaining compliance with the applicable CBAs.</p> <p>DHR ensures that CPD and OPSC HR staff are aware of this requirement, and they should submit all suspension actions accordingly.</p>		documentation from CPD and OPSC. DHR should also be provided with any settlements or rulings that reduced or overturned the discipline so the records can be updated.
2. CPD, OPSC, and DHR should regularly audit and evaluate personnel and payroll records to ensure completeness and accuracy of disciplinary records in all applicable Citywide databases.	<p>DHR agrees with OIG's recommendation that regular audits should be conducted to ensure all disciplinary actions are properly documented in City systems.</p> <p>However, DHR's ability to conduct these audits is contingent upon receiving complete and timely documentation from the operating departments. Specifically, CPD and OPSC must submit payroll</p>	Immediately.	CPD and OPSC would need to submit payroll registers, and DHR would conduct the audits. Any discrepancies should be reconciled so

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
	<p>registers and related documentation to DHR in order for audits to be performed effectively.</p> <p>The request is that all relevant departments coordinate with DHR to ensure the necessary records are submitted on a regular basis. This collaboration is essential to maintaining accurate and complete disciplinary records across City databases.</p>		accurate records are maintained.
4. CPD and DHR should update their written policies regarding the recording of suspensions in Department and City databases, respectively, to clarify the circumstances under which suspensions are or are not recorded in databases, and to ensure consistency among City policies across departments.	<p>DHR will be updating its written procedures to reinforce the requirement that all suspensions—regardless of length—must be documented in City systems.</p> <p>This update is intended to ensure clarity for both DHR records staff and operating departments, and to align with OIG's recommendations for consistent and complete disciplinary recordkeeping.</p>	Immediately.	DHR will update its written procedures. CPD will need to update its internal policies and procedures.

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
	Once finalized, the revised procedures will be distributed to all departments.		
5. CPD, OPSA, and DHR should establish shared written criteria for all possible designations that can be assigned to CPD members who voluntarily resign and retire.	<p>DHR agrees with OIG's recommendation and is committed to working collaboratively with CPD and OPSA to ensure compliance and consistency in disciplinary documentation and auditing.</p> <p>As part of this effort, DHR revised the Ineligible for Rehire Policy in August 2025 and distributed the updated policy to all departments. This revision reinforces the City's commitment to maintaining accurate and complete employment records and supports the broader goals of transparency and accountability in personnel practices.</p>	Immediately	DHR can work with CPD and OPSA should they have questions on the IFR Policy or the resigned under inquiry designations.

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
7. DHR should ensure that Assignment Statuses for CPD members who resign or are terminated include information on the disposition of such resignations and terminations.	<p>DHR agrees with OIG's recommendation regarding the importance of maintaining complete disciplinary records. However, it is the responsibility of CPD and OPSA to provide the necessary documentation to DHR.</p> <p>Once the required information is submitted, DHR will follow its standard procedures to ensure the disciplinary actions are properly recorded in the City's personnel systems.</p> <p>Timely and accurate submission of this information is essential to maintaining compliance and supporting the City's commitment to transparency and accountability.</p>	Immediately	CPD and OPSA on the front end and DHR on the backend once the information is supplied. DHR should also be provided with any settlements or rulings that overturned the terminations.

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OIG Recommendation	Department's Response and Proposed Corrective Action	Implementation Timeframe	Party Responsible
11. CPD, OPSA, and DHR should establish a system to track DHR's receipt of all documents from CPD and/or OPSA to implement and code a disciplinary action.	<p>DHR currently maintains a document management system to support the documentation of disciplinary actions. However, this system is not currently configured to interface with the systems used by the CPD and the OPSA.</p> <p>To enable seamless data sharing and improve audit capabilities, funding must be secured to support the development of system interfaces between DHR, CPD, and OPSA. This integration is essential to ensure timely, accurate, and complete documentation of all disciplinary actions across the relevant departments.</p> <p>DHR is committed to working with all stakeholders to identify funding opportunities and move this initiative forward.</p>	TBD based on funding.	CPD and OPSA should take the lead on obtaining funding and driving the project. DHR will test, provide feedback, and approve the interface project.



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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, 231 S. LaSalle Street, 12th Floor, Chicago, IL 60604, or visit our website at igchicago.org.

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Alternate formats available upon request.

