

## **Coalition Comment on CPD's April 2025 Strategic Plan**

Submitted to CPD's Portal on May 7, 2025

The Coalition provides the following comments on the "Chicago Police Department Strategy for Organizational Excellence April 2025" ("the Plan") and the City's presentation of this document at the Consent Decree status hearing on April 8, 2025.

Although the City presented the Plan to the Court as if the Plan were a roadmap for Consent Decree compliance, the Plan is troublingly devoid of benchmark data, deadlines and details about how CPD will satisfy its many outstanding Consent Decree requirements.

The Plan does not respond directly or cite the IMT's Comprehensive Assessment, Part II; nor does it cite Independent Monitoring Report 11 which was released just days after the Plan. Where it uses generic language bearing some resemblance to the requirements of the decree, the Plan only raises more questions than it answers by omitting direct updates on Decree topics, descriptions of the material outcomes the public can expect to see, and deadlines of any kind.

The Plan therefore is a disappointing missed opportunity. The Consent Decree, fully implemented in letter and spirit, envisions a city where women, Black and brown people, people with disabilities, people with limited or no English proficiency, LGBTQIA individuals, religious minorities, immigrants, people experiencing homelessness, and children are no longer susceptible to unconstitutional police violence and discrimination. The City can only meet this goal if it has a singular aim toward prompt, full Consent Decree compliance.

The Coalition offers further comments below to highlight some of the most important Consent Decree requirements and the questions our members expect to be answered in a true strategic plan for compliance with the Decree.

### **Data Analysis Must Be Used To Correct CPD's Racially Disparate Impact**

- The Plan should outline tangible steps the City will take to eliminate the racially disparate impact of policing in Chicago. The Plan discusses more data collection and trend analysis in general terms, but the trends are well-known. They were identified by the U.S. DOJ and persist in the City's publicly available data on Use of Force, Investigatory Stops, Traffic Stops, and arrests, as well as in the IMT's Community Survey reports and in the lived experience of the Coalition members.
- The Coalition urges the City and CPD to confront these racial disparities head-on and make a plan to end them within the duration of the Consent Decree

### **Mental And Behavioral Health Crisis Intervention**

- The Plan includes NO goals or strategies focused on CPD's response to individuals in crisis. The words "crisis" and "mental health" are found nowhere in the sixty-page document. Section IV of the consent decree includes sixty-nine paragraphs related to CPD's crisis intervention response. A strategic plan that fails to address how CPD

responds to individuals in crisis and the requirements already in place in the consent decree is failing to address one of the most critical issues facing individuals in Chicago.

- CPD has lagged significantly in its compliance of the crisis intervention section, which requires the regular creation and updating of a “Crisis Intervention Plan” and “CIT Officer Implementation Plan” with quarterly and annual reporting on a wide variety of data from incidents involving individuals in crisis. This has not been completed, and these requirements are not referenced in this new strategic plan.
- The overarching goals of the CIT section of the consent decree require that CPD “will interact with individuals in crisis with dignity and respect” and contemplate that implementation of the crisis intervention paragraphs will result in the reduction of use of force against people in crisis, improved safety for all, greater connections of individuals in crisis to healthcare and available community-based service systems, and the decreased involvement of individuals in crisis in the criminal justice system. ¶ 85. The Coalition wants to see benchmarks, deadlines and outcome data that measures these goals.
- In the strategic plan, the only mention of diversion and deflection referenced youth diversion and deflection. While we support all efforts to divert and deflect young people from the criminal legal system, the strategic plan should also reference other populations to be diverted and deflected, such as people experiencing mental and behavioral health crises or whose disability is otherwise impacting their police involvement.

### **CPD Needs To Reduce Its Use Of Force**

- The Tactical Review and Evaluation Division (TRED) Midyear Report 2024, the most recent data available, states:
  - “There were a total of **1,487** use of force incidents in the first half of 2024 compared to **1,131** use of force incidents in the first half of 2023. Through June 30, 2024, there were **5,037** IDRs created involving a use of force incident. This resulted in an average of **840** IDRs created each month involving a use of force. Overall, use of force incidents and the total number of TRRs documenting use of force by Department members is trending upward since the beginning of 2023. This upward trend has also contributed to the increase of total IDRs generated.” p. 31.
  - ¶ 176 of the Consent Decree requires: “CPD officers must recognize and act upon the duty to intervene on the subject’s behalf when another officer is using excessive force.”
  - Intervention against excessive force is also required under the U.S. Constitution and Illinois state law. “The law is clearly established that an officer has a duty to intervene to prevent a false arrest or the use of excessive force if the officer is informed of the facts that establish a constitutional violation and has the ability to prevent it. *Morfin v. City of E. Chicago*, 349 F.3d 989, 1001 (7th Cir. 2003); 720 ILCS 5/7-16 *et seq.*
- CPD therefore needs a concrete plan, with deadlines and numerical benchmarks, to reduce total uses of force against community members and eliminate the well-known code of silence that prevents officers from intervening on behalf of community members.

### **Discipline Is Necessary To Achieving All Consent Decree Goals**

- The Coalition is troubled by the emphasis in the Plan on “[reducing] the time it takes to reinstate officers after the settlement of cases” and “[streamlining] the disciplinary investigative process to cut down on the time it takes to complete investigations to ensure eligible members are not prevented from assignment to specialty units or participating in awards and recognition ceremonies and other departmental activities.” (p. 12).
  - Paragraph 480 of the Decree requires: “Within 120 days of the Effective Date, the City, CPD, and COPA will each develop a policy establishing procedures for COPA, BIA, and Accountability Sergeant’s review and consideration of evidence from civil and criminal litigation.” As of IMR 11, the City was not in full compliance with this paragraph.
- The Plan lacks any acknowledgment that disciplinary investigations may be well-founded or the settlements in question may arise out of serious misconduct. Accountability and discipline are critical to reducing excessive force and racially discriminatory policing. The Consent Decree’s many objectives do not include hurrying officers who have violated Chicagoans’ fundamental rights back onto the street.

### **Early Intervention System**

- Paragraphs 583-98 and 603-03 of the Consent Decree require the City to establish an “early intervention system” to allow the department to identify at-risk behavior and intervene to prevent harm to the public. Weighed against these requirements and several years of discussion of CPD’s EIS pilot program, the Plan’s language regarding “accountability systems” is confusingly vague:
  - “The Bureau of Patrol (BOP) will develop a protocol that identifies activities appropriate to each supervisory rank in the chain of command and creates accountability systems that monitor the appropriate use of delegated authority. The BOP will organize periodic meetings with supervisory staff to identify procedural and policy adjustments, discuss strategic goals and direction, and check in on current issues within the units.” p. 48.
- The Plan does not respond to the IMT’s recommendations regarding the Early Intervention System in the Comprehensive Assessment, Part II, including:
  - Include specific criteria for the automated electronic system for the early intervention system. p.7.
  - The IMT recommends specifying a cadence for soliciting input and feedback from collective bargaining units during the development and implementation of the early intervention system. See ¶601.
  - Revising ¶588 to include specific criteria for the automated electronic system for the early intervention system: “The criteria shall be based on (1) a single indicator, such as the number of misconduct complaints against an officer, (2) a combination of multiple indicators across similarly situated officers, and (3) an algorithmic scoring model that statistically and reliably identifies patterns indicating at-risk behavior. CPD will adjust the criteria as necessary based on data and experience to ensure interventions and support are optimally targeted.” (See ¶¶566–67).

- In light of the Monitor’s specific recommendations for an early intervention system, the Plan’s vague reference to a “developing a protocol” is not enough. The public expects a concrete, informational update and accelerated plan for full implementation of the EIS.

The topics and Consent Decree paragraphs highlighted here do not include all of the unanswered questions, outstanding requirements, and missing information the Coalition hoped to see in CPD’s strategic plan for Consent Decree compliance. We raise these issues to urge the City to keep its efforts focused on material compliance. Success will be achieved when fewer Chicagoans are being hurt and discriminated against by the police in our communities.