**Public Comment on**

***Community Engagement in Policy Development – Pilot Program* (Dept. Notice D22-08)**

The Chicago Police Department’s (CPD) pilot program, *Community Engagement in Policy Development* (Dept. Notice D22-08), fails to give members of the public a real opportunity to change CPD’s policies.

The Community Engagement policy must be overhauled based on the following points:

**General Concerns**

* CPD needs to explain why this is a “pilot program” and why it only applies to “select” policies. Community engagement is a fundamental requirement of the Consent Decree and is essential to ensuring that police reform addresses real community needs and has legitimacy in the eyes of Chicago’s communities. Getting community input on CPD’s policies should be a central focus of CPD’s reform efforts, not a limited “pilot.”
* The policy should specify that CPD must seek and obtain community input *early and often* in the process of developing its policies about interacting with members of the public.
* Posting draft policies online for 15 days for public comment is not sufficient. CPD must mandate substantial additional community input—via focus groups, deliberative dialogues, working groups, surveys, and other methods—on any policy that affects how officers interact with the public, including policies on officer accountability and supervision.
* It is not enough for CPD to “seek input” from community members. CPD must also *address* the community input by making responsive policy changes or explaining why it will not adopt changes recommended by the community.

**Posting Policies for Public Comment**

* Members of the public should have at least one month to submit comments on draft policies. CPD’s 15-day deadline for public comments does not give people enough time to provide real feedback on long, complex policies—particularly when CPD gives the public no notice before posting a policy.
* When CPD posts a policy for public comment, it should also post a plain-language summary. Policies are often complicated and use technical language, making it difficult for members of the community to assess and give input.

**Seeking Community Input**

* CPD must do sustained outreach to specific communities that often have negative interactions with police, including Black and Brown people, young people, LGBTQ people, people with disabilities, people who are homeless, people returning from prison or on parole, and immigrants.
* CPD must do direct outreach to grassroots community organizations, schools, universities, faith-based and religious organizations, advocacy organizations, and service agencies. Posting comment opportunities via CPD’s “social media, websites, and press releases” is not enough.
* CPD must ensure that all materials promoting opportunities for community input are translated into Spanish and other languages. Materials advertising community engagement events should state *in those languages* that there will be translation available at the event*.*

**Community Engagement Events**

* For in-person events with community members, CPD should prohibit officers from bringing their weapons. CPD should also recognize that police uniforms can make community members feel uncomfortable or unsafe.
* CPD must provide accommodations for people with disabilities, including certified interpreters for people who are deaf or hard of hearing.
* CPD must provide translation of both written materials and oral discussion for people with limited English proficiency.
* CPD should hire neutral, independent parties to facilitate the meetings and take detailed notes. CPD should consult the community organizations attending the event in advance about who should serve as the neutral facilitator.
* If possible, the neutral note-taker should use a visual note-taking system, such as a sharescreen or projector, to ensure accuracy and transparency in what is being recorded.

**Follow-up with Community Members**

* Shortly after each meeting with community members, CPD must send the meeting notes to the attendees and publicly post the notes online (without revealing the identities of the attendees). In addition, CPD should publicly post a report of the number of people in attendance and CPD’s outreach efforts.
* CPD must provide written explanations of how it has addressed the community members’ feedback, including explaining any revisions CPD has made to the draft policy and explaining *why* CPD declined to adopt any recommendations. Written explanations should be sent to the meeting’s attendees and published online. CPD should be *required* to holdfollow-up meetings so that community members can raise any remaining concerns—this should not be optional.

**Evaluation**

* The policy does not have any criteria for evaluating the success of CPD’s community engagement. Key measures of success should include: the degree of community participation, the extent to which CPD has revised policies to address community concerns, and whether community members feel that their input has been addressed. CPD should develop these criteria in consultation with impacted communities.