IMPACT FOR EQUITY℠
Combating injustice together

BEYOND THE CHECKLIST:

COMMUNITY-DEFINED COMPLIANCE UNDER CHICAGO'S CONSENT DECREE

JUNE 2026

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About Impact for Equity

Impact for Equity (formerly BPI) is a public interest law and policy center that has fought racial, economic, and social injustice alongside communities most impacted by systemic inequities in the Chicago region and across Illinois for more than 50 years. Known for its innovative and effective advocacy, Impact for Equity advances systemic change so every person can thrive in a community free from systemic barriers.

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Executive Summary

Seven years ago, in March 2019, the City of Chicago entered into a Consent Decree with the State of Illinois. This legal agreement aimed to address decades of harmful practices and rampant police misconduct within the Chicago Police Department (CPD). Since the implementation of the Consent Decree, the City has made measurable progress including the adoption of new policies, expanded officer training, and the development of data, police accountability, and community engagement systems. However, this report finds that there is a significant gap between the City's documented compliance with the Consent Decree and the lived experience of Chicagoans most impacted by policing. Despite years of reform efforts, Black and Latiné Chicagoans continue to report deep mistrust of law enforcement, ongoing harmful police interactions, and skepticism that reforms will lead to lasting change. While the current compliance framework effectively measures whether CPD has adopted policies, completed training, and implemented required systems, it has not consistently required evidence that these reforms are reducing racial disparities, strengthening accountability, rebuilding trust, or meaningfully improving policing outcomes in practice. This raises critical questions about whether the Consent Decree, as it currently operates, is on track to remedy the harm it was created to address.

Key Findings

Compliance prioritizes process over outcomes

The current Consent Decree compliance framework measures whether the CPD has adopted policies, completed training, implemented systems, but does not consistently require evidence that these reforms reduce harm or improve public safety.

Community perspectives on policing remain largely unchanged

Independent Monitoring Team (IMT) surveys, community listening sessions, Coalition's enforcements, and public testimony consistently reflect ongoing concerns regarding excessive force, documented racial disparities, weak accountability, shallow engagement, and limited confidence that reforms will lead to meaningful change.

Case studies reveal gaps between compliance and impact

- **Firearm Pointing (¶¶189–191):** CPD advanced in compliance after implementing policies, training, and reporting systems. However, incidents increased between 2021–2024 and remained elevated in 2025, with persistent racial disparities and minimal supervisory intervention despite high training completion.
- **Complaint Accountability (¶¶424–426):** CPD and COPA improved complaint intake and transparency systems, but complaint trends and demographic patterns remained largely unchanged, raising concerns about accessibility, accountability, and trust.
- **Youth Engagement (¶27):** CPD established Youth District Advisory Councils and engagement structures, but participation from system-impacted youth remains limited, and there is little evidence to show that youth input meaningfully shapes policing practices.

Recommendations

To strengthen the effectiveness of the Consent Decree, this report recommends the Independent Monitoring Team and the Court overseeing the Decree:

- Incorporate outcome-based metrics into compliance determinations, including measurable reductions in misconduct, racial disparities, and harmful police interactions.
- Draft comprehensive assessments to evaluate whether reforms are producing measurable impact in practice and identify where additional safeguards or implementation changes are necessary.
- Increase transparency and stakeholder accountability by clearly communicating how community input informs compliance analysis, corrective action, and implementation decisions.

To strengthen community-driven accountability under the Consent Decree, this report calls on community members and advocates to:

- Participate in public Consent Decree meetings, hearings, and public comment opportunities to ensure that lived experiences and directly impacted voices remain part of the official record as compliance decisions are made.
- Advance community-driven, outcome-based accountability by continuing to push the Court, Independent Monitoring Team and the City to demonstrate how community input informs compliance assessments, corrective action, implementation decisions, and reform priorities.

The Consent Decree has produced important structural reforms but has not consistently demonstrated that these reforms are changing policing outcomes on the ground. Without integrating community-defined, outcome-based measures into compliance assessments, there is a risk that the City of Chicago will achieve formal compliance without delivering the substantive change the Consent Decree was intended to secure.

Introduction

In 2019, the Chicago Police Department ("CPD") entered into a Consent Decree, a court-enforced agreement with the State of Illinois designed to address rampant racial disparities and misconduct within the CPD by instituting sweeping reforms. As of December 31, 2025, CPD has reached full compliance with 25% of the Consent Decree's mandates. Compliance has led to several changes, including the implementation of new policies, increased transparency in data, more frequent community engagement, and enhanced training for officers. However, seven years into the Consent Decree, the slow pace of progress has raised concern that the Consent Decree risks becoming a framework that exists primarily on paper rather than an active and forceful tool capable of driving policing reform. Black and Latiné Chicagoans continue to report experiences of excessive force and deep mistrust of law enforcement, while policing data and community surveys continue to document discriminatory policing and racial disparities. These conditions mirror the harms that prompted legal intervention in the first place. While Black and Latiné Chicagoans have disproportionately borne the harms of unconstitutional policing practices, the failure to achieve meaningful and effective reform ultimately affects all Chicagoans by weakening public trust, undermining legitimacy, reducing accountability, and limiting the effectiveness of public safety systems citywide.

This report comes at a moment when the Chicago Consent Decree is reaching a critical juncture. Compliance is advancing across all areas, laying crucial groundwork for what will ultimately be the outcome of this process. As CPD moves closer to full compliance in several reform areas, key questions remain unresolved. In many cases, it is unclear whether these reforms have or can reduce harm, increase accountability, or improve the lived experiences of Chicagoans most impacted by policing. Community members, particularly Black and Latiné Chicagoans most impacted by policing continue to express concerns about policing in their communities. Recent increases in reported use-of-force incidents and ongoing racial disparities underscore the urgent need to reexamine how the Consent Decree is used to advance reform.

This report examines the gap between procedural compliance and residents' lived experiences. It finds that at times Consent Decree compliance evaluations have fallen short of analyzing whether reforms are producing meaningful improvements in practice. This report argues that the existing framework already provides significant discretion for the IMT and the Court to place greater emphasis on operational impact, community-defined outcomes, and measurable reductions in harm when evaluating compliance and determining whether reforms are functioning effectively in practice.[1] Through compliance determinations, enforcement actions, implementation of negotiations, public reporting, and judicial oversight, these entities already possess mechanisms capable of strengthening how reform progress is assessed and enforced. Recently, the Independent Monitoring Team, which is responsible for assessing CPD's compliance with required reforms, responded by signaling a shift toward placing greater emphasis on operational impact and outcome-based assessments.[2] However, these outcome-based metrics have not yet been systematically incorporated into compliance decisions. As the Consent Decree progresses, it is critical that the IMT and the Court ensure that police interactions with Chicagoans are also meaningfully improving.

The first section of the report provides an overview of the Consent Decree, explaining its origin and the current compliance process. It then seeks to amplify the concerns of those directly impacted by police misconduct, drawing on the results of community listening sessions hosted by Impact for Equity and the IMT and Consent Decree Coalition's various efforts to collect and enforce community feedback on policing in Chicago since 2019. This is followed by a series of case studies that examine key requirements within the Consent Decree, detailing how they reached their current level of compliance, and analyzing their impact thus far. Finally, this report offers recommendations to strengthen and expand the compliance process to meet community-defined metrics of success. These recommendations aim to shift the focus of compliance from whether the CPD has completed required actions to whether those actions have reduced harm, increased accountability, and led to tangible improvements in safety, trust, and well-being, based on the lived experiences of community members. If

[1] The Consent Decree grants the Independent Monitoring Team and the Court substantial authority to evaluate operational effectiveness, require corrective action, conduct comprehensive assessments, and enforce compliance where reforms are not functioning effectively in practice. See Consent Decree §§ XII(H), XII(I), XII(P).

[2] Independent Monitoring Team, *Independent Monitoring Report 13* (2026).

the proposed recommendations are implemented by the IMT and the Court, we believe the Consent Decree will become a more effective tool and bring CPD closer to addressing the deep structural problems the Decree was intended to correct. Until structural changes are meaningfully adopted, CPD risks documenting reform that the Consent Decree calls for without delivering it.

Background

For decades, the relationship between Chicagoans, particularly those in historically disenfranchised Black and Latiné communities, and CPD has been defined by aggressive over-policing and deep mistrust.

In 2014, CPD Officer Jason Van Dyke shot 17-year-old Laquan McDonald 16 times while McDonald was walking away from police.[3] CPD initially claimed that McDonald had lunged at the officers. But when the court ordered the release of camera footage in 2015, the video directly contradicted CPD's account of the incident and confirmed community concerns about misconduct and institutional cover-ups.[4] The video triggered widespread protests across the country,[5] activating community organizers, civil-rights advocates, and faith leaders to call for CPD to be held accountable and undergo systemic reform.

In response to public outcry, the U.S. Department of Justice (DOJ) conducted an investigation into CPD. Their findings exposed widespread use of unconstitutional practices within CPD and outlined critical reforms the Department needed to make. After federal reform efforts stalled, the state Office of the Attorney General (OAG) sued to secure court-ordered oversight, leading to the establishment of the 2019 Consent Decree.[6]

How the Chicago Consent Decree Works

The Consent Decree is a court-enforced agreement that requires CPD and other related city departments to implement specific reforms described in 877 individual paragraphs across 11 major reform areas. These paragraphs address issues ranging from use of force, officer training, data transparency, supervision, community engagement, and accountability systems.

The Consent Decree uses a staged compliance framework to measure progress toward fulfilling each paragraph. The three stages of compliance are:

- **Preliminary Compliance:** CPD develops and adopts written policies that meet the requirements of the Consent Decree. During this phase, the Independent Monitoring Team (IMT) reviews policy language to determine whether it aligns with the standards required by the Consent Decree. Preliminary compliance, therefore, reflects that reforms exist on paper but have not yet been implemented.
- **Secondary Compliance:** CPD trains officers on the required policies and systems. The IMT evaluates training completion rates, supervisory guidance, and early implementation evidence. At this stage, reforms are being introduced across the department but may not yet be carried out consistently.
- **Full Operational Compliance:** CPD demonstrates that reforms function consistently in practice. The IMT reviews operational evidence such as incident reports, supervisory reviews, data systems, and audit samples to determine whether the reforms are implemented, and the department is consistently abiding by the new rules and systems.

[3] Gorner, Jeremy; Meisner, Jason, *FBI investigating death of teen shot 16 times by Chicago cop*, Chicago Tribune (April 14, 2015), https://www.chicagotribune.com/2015/04/14/fbi-investigating-death-of-teen-shot-16-times-by-chicago-cop/.

[4] Paul Schutz, *City Will Release Laquan McDonald Police Shooting Video*, WTTW (Nov.19, 2015, 6:01pm), https://news.wttw.com/2015/11/19/city-will-release-laquan-mcdonald-police-shooting-video.

[5] Mitch Smith, *Four Chicago Police Officers Fired for Cover-Up of Laquan McDonald Shooting*, NY Times, (July 19, 2019), https://www.nytimes.com/2019/07/19/us/chicago-police-fired-laquan-mcdonald.html.

[6] Office of Public Affairs, *Justice Department Opens Pattern or Practice Investigation into the Chicago Police Department* (Dec. 7, 2015), https://www.justice.gov/archives/opa/pr/justice-department-opens-pattern-or-practice-investigation-chicago-police-department ; U.S. Department of Justice Civil Rights Division & U.S. Attorney's Office for the Northern District of Illinois, *Investigation of the Chicago Police Department* (Jan. 13, 2017); *State of Illinois v. City of Chicago*, No. 17 CH 07646 (Ill. Cir. Ct. 2017), https://www.illinoisattorneygeneral.gov/News-Room/2006-2018-Press-Archive/201708-31_City_of_Chicago_lawsuit_filedcomplaint.pdf.

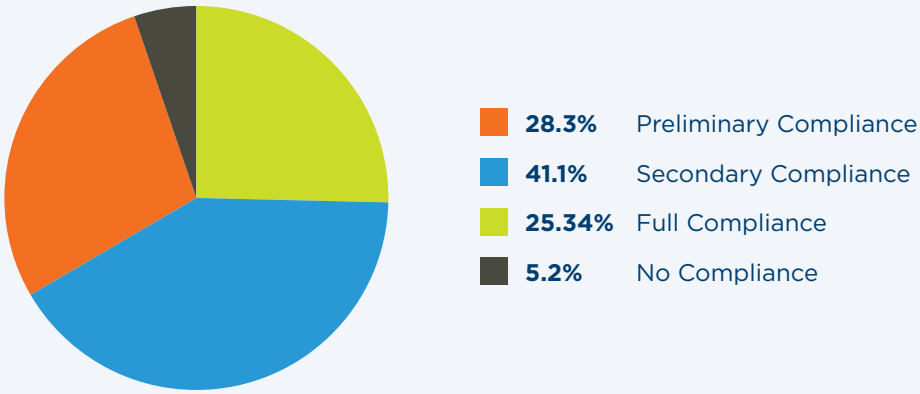
Three Stages of Compliance

These tiers are sequential: CPD must first adopt policies, then train police officers on the policy, and finally demonstrate that they are "carrying out the requirement in practice."[7] For each paragraph, CPD must present evidence such as newly created policies, rates of training conducted across the department, and operational data requirements to demonstrate how it has complied. Although the Consent Decree establishes the overall compliance framework, the IMT has broad discretion in how it evaluates operational effectiveness, interprets compliance requirements, and determines whether reforms are functioning in practice. In its semiannual monitoring reports, the IMT describes CPD's progress and identifies the actions CPD must take to advance through the stages of compliance. The Court, OAG, and the Consent Decree parties also shape implementation through enforcement proceedings, public hearings, and ongoing compliance review. Once the city reaches full compliance with every paragraph, the Consent Decree will terminate, ending the court's oversight of CPD.

As of December 31, 2025, the city had reached full compliance with 151 paragraphs (25% of the Consent Decree's mandates), preliminary compliance with 176 paragraphs (29%), and secondary compliance with 254 paragraphs (42%). 28 paragraphs (5%) remain out of compliance.[8]

CPD has made the most headway on use of force (41%) and officer wellness (39%) but has made little to no progress on supervision (0%), impartial policing (3%), and crisis intervention (5%). According to the IMT, the uneven pace of compliance across reform areas reflects the differences in complexity, resources, and measurability required.[9] In several reform areas, including crisis intervention, supervision, and impartial policing, progress has been associated with documented challenges such as staffing shortages, delays in finalizing key plans, gaps in data systems, and failure to demonstrate sustained behavioral and cultural change.[10] The following figure shows how progress varies widely across each reform area.

Figure 1: Distribution of Consent Decree Compliance Status Across Paragraphs (as of December 31, 2025)



[7] CD p.197.

[8] Independent Monitoring Team, Independent Monitoring Report 13 (2025).

[9] *Id.*

[10] *Id.*

"**I had no idea this even existed until today.** It's clear that's true for a lot of us in this room."

— One Northside Listening Session

The three compliance stages comprise a clear framework for measuring progress. However, this framework focuses on whether CPD has created policies, trained officers, and established systems. It has not consistently required evidence that the underlying harms, which prompted the Consent Decree's requirements, has demonstrably decreased.

While Chicago's Consent Decree differs from those in other cities that explicitly incorporate outcome-based measures into compliance assessments, these models demonstrate that more outcome-oriented compliance evaluation can be operationalized through changes in monitoring methodology, audit practices, implementation expectations, enforcement priorities, and judicial oversight without requiring formal amendment of the Consent Decree itself. For example, the Consent Decrees in Cleveland, Ohio and Baltimore, Maryland require ongoing qualitative and quantitative outcome assessments, including assessing trends in the use of force, stops, arrests, complaints, and community survey data to evaluate whether reforms are producing measurable improvements in policing outcomes.[11]

While the IMT has at times referenced trends such as use of force, complaints, and community feedback in its assessments, the Consent Decree does not mandate using these outcome measures in determining compliance, and compliance determinations across reporting periods have not consistently incorporated them. Notably, the IMT has recently indicated that future reporting will place greater emphasis on assessing operational impact and sustainability, including whether reforms are translating into practice and whether CPD can produce outcome-based audits. Although this shift is prospective and has not yet been systematically included in compliance decisions, it aims to address the gap between procedural compliance and real-world impact.

Figure 2: Percent of Full Compliance Achieved by Reform Area (as of December 31, 2025)

Community Policing	**26%**
Impartial Policing	**10%**
Crisis Intervention	**12%**
Use of Force	**48%**
Recruitment, Hiring, and Promotions	**25%**
Training	**13%**
Supervision	**7%**
Officer Wellness and Support	**42%**
Accountability and Transparency	**32%**
Data Collection, Analysis, and Management	**14%**

[11] See, e.g., *Cleveland Consent Decree* at 84–88 (requiring annual qualitative and quantitative outcome assessments across use of force, stops, searches, arrests, bias-free policing, and community engagement); *Baltimore Consent Decree* at 166–171 (requiring Outcome Assessments and annual community surveys measuring trust, satisfaction, and policing effectiveness). These models demonstrate a more outcome-oriented approach to compliance than Chicago's current framework.

Key Players in the Consent Decree

Understanding the Consent Decree requires understanding of the key institutions responsible for implementing and overseeing it.

City of Chicago

The City of Chicago is the primary party responsible for complying with the Consent Decree. This includes the Chicago Police Department, the Civilian Office of Police Accountability (COPA), the Police Board, the Office of Emergency Management and Communications (OEMC), the Office of the Inspector General (OIG), and the Bureau of Internal Affairs (BIA). Together, these entities are responsible for implementing reforms, including policy changes, officer training, investigations of misconduct, and strengthening accountability systems.

Illinois Office of the Attorney General (OAG)

The OAG represents the State of Illinois as a party to the Consent Decree and plays a central role in both enforcement and ongoing reform efforts. In addition to participating in enforcement proceedings, the OAG actively reviews compliance, submits formal assessments and recommendations to the Court, and engages in negotiations with the City and other parties to strengthen reform measures.

Independent Monitoring Team (IMT)

The IMT is a court-appointed group responsible for evaluating CPD's compliance. The team conducts audits, reviews policies and practices, publishes semiannual reports, and engages the public through public hearings and community input processes.

Consent Decree Community Coalition

Two groups—Communities United and the Campbell Plaintiffs—represent community organizations and residents who were instrumental in securing the Consent Decree and remain formal parties to it. Comprised of grassroots and civil rights organizations directly impacted by police violence, they play an ongoing role in monitoring implementation and advocating for meaningful reform. These coalitions also have the authority to file enforcement actions when the City is not in compliance. The goal of an enforcement action is to bring issues before the Court, which can then require the City to take corrective steps to ensure the Consent Decree is fully and effectively implemented.

U.S. District Court

The Court oversees the Consent Decree and has ultimate authority to enforce compliance. U.S. District Judge Rebecca Pallmeyer presides over the case and can order corrective actions, require additional measures, or hold the city accountable if it fails to meet its obligations.

Community Listening Sessions and Public Input

Community members are central to evaluating whether Consent Decree compliance is producing meaningful change. Residents interact with police daily and therefore contain essential insight into whether reforms are working in practice. To understand these experiences, we analyzed three sources of community input collected since the inception of the Consent Decree process:

1. Public surveys and listening sessions conducted by the Independent Monitoring Team;
2. Public comments, letters, and filings from the Consent Decree Community Coalition; and
3. Community listening sessions conducted by Impact for Equity.

While these efforts use different methods, the findings collectively reflect ongoing concerns that CPD's reforms have not yet consistently translated into safer policing practices or measurable reductions in documented disparities.

The Independent Monitoring Team's Surveys and Community Listening Sessions

As part of its oversight function, the IMT hosts quarterly community listening sessions and administers citywide surveys every two years to measure trends in public trust, perceptions of police conduct, and experiences across demographic groups. Together, these tools allow the IMT to compare formal compliance findings with lived community experience.

Across multiple IMT survey cycles, residents reported low trust in CPD and skepticism that reforms would actually bring lasting change.[12] In the IMT's 2020 survey, CPD received positive ratings on just 20 of 54 questions (37%) relating to trustworthiness and procedural justice.[13] Only 47% of respondents believed CPD treated marginalized communities fairly.

The data shows, Black men, particularly young Black men, experienced the most frequent and negative encounters, including disproportionate rates of being stopped in their vehicles and having police point firearms at them. Testimony from listening sessions that same year described

"There's **never** been a time where I've been out in public and **felt safer** because police were around."

— Southside Organized for Unity and Liberation Listening Session

[12] *Community Survey Report (November 2019–February 2020)*, August 26, 2020; *Community Survey Report (October 2021–May 2022)*, May 30, 2023; *Community Survey Report (March 18, 2024–April 22, 2024)*, January 27, 2025.

[13] Community Survey Report (November 2019–February 2020), August 26, 2020.

"[Police officers should] See us through human eyes. They're human too, just like us. We have families that want to see us come home. We are so **scared of the police**. We shouldn't be living like that."

— Community Renewal Society Listening Session

excessive force, officers deliberately concealing their badge numbers, and experiences residents perceived as bias-based policing.[14]

By 2022, it seemed that public confidence had further eroded. Positive ratings declined across key areas, including effectiveness, engagement, and accountability. CPD received positive ratings on only 11 of 54 questions (20%), down from 37% in 2020.[15] 43% of respondents described themselves as "doubtful" or "very doubtful" that reform would result in lasting change, an increase from 33.1% in 2020.[16]

By 2024, sentiment among young Black men showed some improvement. Negative ratings decreased across approximately 85% of survey questions, particularly in areas of trustworthiness and procedural justice, and overall positive ratings increased modestly from 20% in 2020 to 27% in 2024. However, these gains did not translate into strong overall confidence in reform outcomes, and young Black men continued to rate CPD less favorably than Chicagoans overall. At the same time, respondents' reported experiences continued to reflect persistent disparities, including frequent involuntary contact, discriminatory treatment, and exposure to high-impact encounters such as weapon-pointing incidents, contributing to their ongoing fear and avoidance of police.[17]

Participants also offered clear and consistent recommendations to the IMT to improve policing outcomes including expanding de-escalation training to reduce excessive force, strengthening accountability systems, improving complaint transparency, increasing crisis intervention training (CIT), providing mental health support for officers, and fostering meaningful engagement with youth.[18]

The OAG's independent analysis of the IMT Community Surveys and related fillings from 2020 to 2023, reinforced these same community concerns, noting persistent mistrust of CPD, particularly among Black Chicagoans, reports of excessive policing, as well as the City's failure to meaningfully incorporate community input into reform efforts.[19]

While the IMT collects and acknowledges community concerns, it has not consistently demonstrated or clearly documented how community experiences and recommendations shape compliance determinations or advancement through compliance stages.

[14] *Transcript of Proceedings – Independent Monitor Listening Sessions*, August 19, 2020; *Transcript of Proceedings – Independent Monitor Listening Sessions*, August 20, 2020.

[15] IMT *Community Survey Report (October 2021–May 2022)*, May 30, 2023.

[16] IMT *Community Survey Report (November 2019–February 2020)*, August 26, 2020; IMT *Community Survey Report (October 2021–May 2022)*, May 30, 2023; IMT *Community Survey Report (March 18, 2024–April 22, 2024)*, January 27, 2025.

[17] *Special Report: Focus Groups with Black and Latino Men, Ages 18–35*, September 1, 2022.

[18] Hoereth, J. K., & Ramos, N. E. (2018). *Consent Decree Community Engagement* (UIC IPCE Report); Transcript of Proceedings – Independent Monitor Listening Sessions (August 19–20, 2020).

[19] Illinois Office of the Attorney General, Comments on IMT Community Survey Reports (2020, 2022); Illinois Office of the Attorney General, Response to IMT Special Report on 2020 Protests; and related filings in State of *Illinois v. City of Chicago* (2020–2023).

Consent Decree Coalition's Public Comments, Letters, and Filings

Public comments at Consent Decree hearings, letters, court filings, enforcement actions, and policy submissions from the Consent Decree Community Coalition provide another record of how directly impacted communities have experienced CPD's reform efforts. These filings consistently argue that CPD's approach to reform prioritizes technical compliance over substantive change, warning that CPD often revises policies without sufficient enforcement mechanisms, meaningful community input, or measurable impact on officer behavior.[20]

Beyond public comments and policy feedback, the Coalition has also repeatedly utilized formal enforcement actions available under the Consent Decree to challenge CPD policies and implementation practices they believed failed to meaningfully reduce harm or comply with the Decree's underlying purpose. Since 2021, the Coalition has filed or initiated multiple enforcement-related actions, including motions to enforce provisions related to search warrants and home raids, investigatory stops and searches, protest and mass arrest policies, and stop and frisk reforms.[21] These filings frequently argued that CPD's proposed reforms relied too heavily on procedural policy revisions while failing to incorporate sufficient accountability measures, operational safeguards, community input, or measurable protections against unconstitutional and racially disparate policing practices.

In many instances, these enforcement efforts did not culminate in formal evidentiary rulings or adversarial findings by the Court, but instead resulted in policy revisions, stipulations, implementation changes, fairness hearings, or negotiations involving the Court, IMT, OAG, City, and Coalition parties. For example, the Coalition's 2021 enforcement motion concerning CPD's execution of search warrants and home raids led to a 2022 stipulation regarding search warrant practices, and a subsequent 2024 Court order resolving remaining policy disputes.[22] Similarly, the Coalition's 2025 enforcement motion concerning CPD's investigatory stop policies and vehicle searches based on cannabis odor resulted in revisions to the policy revisions after the IMT concluded that portions of the policy conflicted with the Consent Decree's plain language.[23]

This concern was also visible in the coalition's work on use of force and officer accountability. For instance, the Coalition raised concerns that CPD's Bureau of Internal Affairs investigative file policy[24] lacked critical safeguards needed to ensure thorough investigations, including

"If a cop does something illegal, they get the **benefit of the doubt** for some of the most heinous crimes... If that was me, I would have **cuffs on my wrists**."

— One Northside Listening Session

[20] ACLU of Illinois. *Chicago Police Department Consent Decree: Coalition comments, letters, and filings*.

[21] See *Chicago Police Department Consent Decree*, ACLU of Ill., https://www.aclu-il.org/chicago-police-department-consent-decree (2026) (collection of Coalition's enforcement actions, motions, comments, position statements, and other filings related to implementation and enforcement of the Chicago Police Department Consent Decree).

[22] See *Coalition to Enforce the Chicago Consent Decree Regarding Search Warrants/Home Raids*, Motion to Enforce Consent Decree (Jan. 13, 2021); Order Resolving Search Warrant Issues (May 14, 2024).

[23] See *Campbell Position Statement on Parties' Amended Stipulation on Stop, Frisks, and Loitering Enforcement and Motion to Enforce Consent Decree ¶ 806(i) Prohibiting Police Searches Based on Odor of Cannabis* (Aug. 13, 2023); *Coalition Withdrawal of Motion to Enforce ¶ 806(i) Odor of Cannabis*.

[24] Special Order S08-01-09.

"When you have a **hyper-policed presence**, it creates a perception that certain communities are inherently criminal."

— Southside Organized for Unity and Liberation Listening Session

stronger standards for completeness, transparency, and accountability.[25] Conversely, the IMT determined that the BIA policy satisfied preliminary compliance with ¶¶486–487, as well as other related paragraphs, without requiring the Coalition's suggested protections.[26] This determination effectively allowed CPD to demonstrate progress across several paragraphs using a framework that the Coalition had identified as insufficient to ensure meaningful investigative rigor and transparency.

In 2022, the Coalition conducted community engagement to inform the revamp CPD's use of force policies.[27] Community members raised concerns about inadequate restrictions on weapon-pointing, weak reporting requirements, and insufficient safeguards governing weapons. In 2023, the Coalition argued that deep-seated cultural barriers continued to block real reform to use of force practices, including training approaches that reinforced an "us versus them" mindset, prioritization of officer safety over reducing harm to civilians, and failure to meaningfully incorporate racial bias mitigation principles.[28] The Coalition emphasized that to actually reduce harm, policy revisions must be backed by stronger de-escalation requirements, rigorous reporting obligations, and supervisory accountability. Despite the community's advocacy for more robust safeguards, the IMT nonetheless advanced CPD's compliance with key use of force paragraphs based on the department's adoption of policy and training completion. Under ¶161, CPD moved to secondary compliance after demonstrating that more than 95% of officers completed de-escalation and use of force training and that reporting systems were in place,[29] even though the Coalition had raised concerns that these systems were insufficient to ensure meaningful de-escalation in practice.[30] These enforcement efforts demonstrate that the Community members within the Coalition have consistently attempted to push the Consent Decree process toward more robust, outcome-oriented accountability measures.

[25] ACLU of Illinois, et al. (2022). Coalition Letter on CPD's Bureau of Internal Affairs (BIA) Policies (May 13, 2022).

[26] IMR 7 page 196-198.

[27] ACLU of Illinois. (2022). *Chicago's Use of Force Community Working Group (Report from the Community Representatives)*.

[28] ACLU of Illinois. (2023, March). *Second Report of the Community Representatives of Chicago's Use of Force Working Group*.

[29] Independent Monitoring Team, *Independent Monitoring Report 11* (2024).

[30] Chicago Use of Force Community Working Group, Public Report (2022); Chicago Use of Force Community Working Group, *Second Report on CPD Training* (Mar. 2023).

Impact for Equity Consent Decree Community Listening Sessions

Impact for Equity facilitated seven community listening sessions between August 2024 and December 2025 to capture Chicagoans lived experiences five to six years into the Consent Decree and to ensure that community voices were not sidelined in Consent Decree advocacy spaces. The sessions provided an intimate, informal opportunity for Chicagoans' to share their assessment of whether CPD reforms have produced meaningful change on the ground. Approximately 150 participants representing diverse socioeconomic backgrounds, age groups, and racial identities, joined the conversations.[31] We recorded, analyzed, and coded their testimonies by key themes. Each session lasted approximately 90 minutes, with a small group of five to fifteen people per session. Across sessions, participants described consistent themes that cut across geographic and generational differences: While the Consent Decree has produced new policies, residents consistently reported limited tangible improvement in their experiences with policing. The key themes raised during the listening sessions, ranked in order of priority, are summarized below in Figure 3.[32]

Figure 3: Ranked Community Priorities from Listening Sessions and Corresponding Consent Decree Sections

Rank	Theme	Resident Voice	Relevant Consent Decree Paragraphs
1	**Accountability and Oversight:** Residents described a deep lack of trust in CPD's internal disciplinary system, calling it self-policing that shields officers from consequences.	***"Every time an officer abuses their power they end up right back on the street with no punishment."***	¶419-¶565 (Accountability & Misconduct)
2	**Militarization and Over Policing:** Residents described the presence of armored vehicles, riot gear, and tactical units as creating a "war zone" atmosphere. These displays were perceived as symbols of fear and aggression, prompting calls to reallocate resources toward youth programs, mental health care, and community safety initiatives.	***"They use one needle in a haystack as their rationale to act aggressive to every person of color."***	¶153-¶248 (Use of Force)
3	**Community Policing:** Participants characterized CPD's model of community policing as performative and disconnected from meaningful relationship-building. Officers were frequently viewed as outsiders who lacked respect for community members, leading to calls for stronger residency requirements, sustained neighborhood engagement, and increased investment in prevention and trust-building initiatives.	***"A lot of these officers come into our neighborhoods and just harass us, but they don't do that in their own neighborhoods."***	¶8-¶48 (Community Policing)

[31] Youth leaders from the following organizations also spoke about being targeted by CPD: Mikva Challenge and GoodKidsMadCity, South and Northside Chicagoans including Southside Organizers for Unity and Liberation and ONE Northside, formerly incarcerated leaders from LiveFree Illinois, immigrant and faith leaders from Community Renewal Society, and Westside Chicagoans from BlackRoots Alliance.

[32] Themes were ranked based on their relative prominence across the seven listening sessions. Rankings reflect the frequency, consistency, and intensity with which participants raised concerns. Higher-ranked themes were those that emerged most consistently across sessions and were described by participants as having the greatest impact on their experiences with policing.

Rank	Theme	Resident Voice	Relevant Consent Decree Paragraphs
4	**Hiring, Vetting, and Leadership Stability:** Participants questioned how CPD recruits and retains officers, noting inconsistent standards and high leadership turnover that disrupt reform continuity. Many urged the city to strengthen psychological evaluations and ensure stable, community-focused assignments for officers.	***"What are the qualifications for being a police officer? Because it feels like they're just hiring anyone."***	¶249- ¶264 (Recruitment, Hiring and Promotion)
5	**Crisis Response and Training:** Residents voiced that police are not equipped to handle mental health or non-violent crises. They advocated for unarmed, trained professionals to respond to such calls and for scenario-based, trauma-informed training that prioritizes de-escalation over force.	***"Police are not mental health professionals. They are doing 3-4 different jobs."***	¶83-¶152 (Crisis Intervention), ¶265-¶340 (Training)
6	**Data and Accountability:** Residents expressed frustration that CPD collects vast amounts of data but but fails to use it to inform make it meaningful or accessible. They stressed data without transparency and application only deepens mistrust.	***"They collect all this data and none of it helps us. The data shows us we [Black communities] are being targeted, and nothing is being done."***	¶566-¶609 (Data)
7	**Transparency and Public Perception:** Participants indicated they had no prior awareness of the Consent Decree. This lack of visibility prompted calls for more regular public updates, accessible data dashboards, and expanded community education to better communicate reform progress.	***"That means information is not getting out there on social media or other places too, that we can, like, understand this. Education is part of what they should be doing."***	¶645–¶651 (Community Surveys and Public Engagement)

Residents' testimonies reflect both frustration and a collective vision for improved accountability and transparency. These findings are not new. As mentioned earlier in the report, similar concerns have been consistently elevated through the IMT's surveys and community engagement processes. The alignment across all three sources underscores a persistent and well-documented gap between formal compliance and lived experience.

"**Community doesn't generally trust police.** [The police] lie—not just about events, but about what they say they're going to do. We go to the police station to coordinate, attend these forums, have great conversations, and then there's no follow-up. We don't believe them."

— LiveFree Illinois Listening Session

Case Studies on Consent Decree Compliance

Throughout the Consent Decree process, there have been efforts made to broaden the scope of compliance assessments and think more about impact prior to granting full compliance. For example, under ¶153, CPD achieved secondary compliance by completing training and setting up the Incident Debriefing Report Supervisory Dashboard. The Coalition emphasized that these measures alone were insufficient to ensure effective supervisory accountability and real-time intervention in practice.[33] The IMT itself noted ongoing gaps, including limited evidence that supervisors were consistently identifying patterns or correcting officer behavior.[34] The IMT then explicitly conditioned on whether supervisors actually use these systems to identify and address unreasonable force.

This section expands on those efforts by examining how certain Consent Decree paragraphs have advanced through the stages of compliance to determine whether and how future compliance assessments can be more closely aligned with community needs while remaining fair and reliable.

Methodology

For this study, Impact for Equity reviewed the compliance process for three sections of the Decree:

1. Weapon discipline and firearm pointing (paragraphs 189-191): The IMT determined CPD reached full compliance with paragraphs 189–190, while paragraph 191 remains in secondary compliance.
2. Misconduct data transparency and public dashboard (paragraphs 424–426), now in full compliance; and
3. Youth engagement strategy (paragraph 27), which remains in secondary compliance.

These paragraphs reflect core areas of community concern raised during listening sessions, public testimony, and survey responses throughout the duration of the Consent Decree. For example, we selected the paragraphs about weapon discipline because Chicagoans have consistently reported that CPD regularly escalates encounters by pointing firearms, while available data shows these practices disproportionately impact Black and Latiné Chicagoans.[35] Because of the longstanding community distrust in how CPD manages its complaint process and accountability systems, we selected the paragraph related to misconduct complaints.[36] Finally, we selected the paragraphs about youth engagement, which is intended to address the absence of authentic, youth-centered participation in policing policy conversations, because it remains a popular paragraph for discussion in community and Consent Decree-centered conversations.[37] These case studies examine how compliance has been assessed to date and whether advancement through compliance stages reflects meaningful changes in practice. Each section is examined through two lenses: the IMT's compliance framework and our assessment of community impact. We examine how existing compliance provisions are currently interpreted and operationalized and determine how more outcome-based evaluations and community impact assessments could be incorporated into compliance decisions under the current framework. To do this, we reviewed Independent Monitoring Reports, CPD policies, public dashboards, training records, notes from Consent Decree stakeholder interviews, community feedback, and other quantitative and qualitative data. By examining compliance through these two lenses, this case study evaluates whether tier advancement aligns with the intended goals of the Consent Decree.

[33] U.S. Department of Justice, *Investigation of the Chicago Police Department* (2017).

[34] *Id.*

[35] *Id.*

[36] *Id.*

[37] *Id.*

Case Study One: Is CPD Unnecessarily Pointing Firearms at Chicagoans? (¶¶189–191)

For many Chicagoans, particularly those most impacted by policing, having a firearm pointed at them represents one of the most immediate and traumatic forms of escalation during a police encounter. Consent Decree paragraphs 189-191 were designed to regulate this practice by requiring CPD to define when firearm pointing is "objectively reasonable under the totality of the circumstances" (¶189), document each incident through linked reporting systems, notify the Office of Emergency Management (OEMC) (¶190), and ensure meaningful supervisory review and intervention for wrongful firearm pointing (¶191).[38]

The Consent Decree Coalition raised written objections to CPD's firearm-pointing policy when it was developed in 2019, arguing that the policy did not meet the requirements of the Consent Decree and failed to include sufficient safeguards to limit unnecessary or excessive firearm pointing.[39] In particular, the Coalition criticized the policy for maintaining a broad "reasonableness" standard that allowed officers significant discretion and advocated that firearm pointing should be tightly restricted, clearly defined, and subject to meaningful supervisory oversight. The Coalition emphasized that compliance should be measured by reductions in firearm-pointing incidents, clear limits on officer discretion, consistent documentation of all incidents, and real-time supervisory intervention that prevents harm, not simply a retrospective review. Despite these concerns, the IMT found that CPD achieved preliminary compliance based on the adoption of the policy, alone, without requiring the additional restrictions proposed by the Coalition.[40]

As of IMR 13[41], CPD has reached full compliance with ¶¶189–190, while ¶191 remains in secondary compliance. The IMT found CPD satisfied preliminary compliance with ¶189 once CPD policy governing firearm-pointing incidents was finalized in November 2019[42] and later reached secondary compliance by demonstrating that officers were trained on use-of-force policies, including firearm-pointing requirements, with more than 95% of officers completing the required in-service training.

CPD similarly reached preliminary compliance with ¶190 by adopting policies requiring notification to OEMC and the electronic linkage of related records.[43] CPD later reached secondary compliance by training officers on these requirements. For ¶191, CPD achieved preliminary compliance and demonstrated high completion of supervisor training, with 97.5% of supervisors completing the required training.

Across these paragraphs, the IMT reviewed training completion data, documentation systems, and the Tactical Review and Evaluation Division (TRED) reports.[44] While the IMT reviewed implementation and system performance, compliance advancement did not require evidence of changes in officer behavior or reductions in firearm-pointing incidents. To evaluate whether these paragraphs are making an impact on the ground, compliance should be evaluated based on whether unnecessary firearm pointing and disparities are actually reduced, (p. 189), whether all incidents are consistently documented and reported (¶190), and whether supervisors intervene in real time to prevent or correct harm (¶191).

[38] Chicago Police Department Consent Decree, ¶¶ 189-191 (2019).

[39] Consent Decree Coalition, *Public Comment on Special Order S03-22: Firearm Pointing Incidents* (March 31, 2025).

[40] Communities United, Community Renewal Society, ONE Northside, Next Steps, and ACLU of Illinois, *Comments on the Chicago Police Department's Draft Notice on Firearm Pointing Incidents* (July 31, 2019).

[41] Independent Monitoring Report 13 (April 2026) is the most recent semiannual report issued by the Independent Monitoring Team at the time of this analysis.

[42] Chicago Police Department, Firearm Pointing Incidents, Special Order S03-22 (Mar. 10, 2025).

[43] Independent Monitoring Team, *Independent Monitoring Report 9* (2022).

[44] The Tactical Review and Evaluation Division ("TRED"), a CPD headquarters-level unit responsible for reviewing use-of-force incidents, including firearm-pointing reports, identifying policy, training, and supervisory deficiencies, and issuing recommendations for corrective action.

However, the data shows that firearm-pointing incidents increased from 2,562 incidents in 2021 to 2,925 in 2022. By 2023, there were 3,719 firearm-pointing incidents, and this number climbed to 4,209 incidents in 2024.[45] There was a 43.9% increase in firearm-pointing incidents between 2022 and 2024. In 2025, mid-year data shows that firearm-pointing incidents are projected to remain elevated, with 2,796 incidents recorded.[46] Total FPIRs increased by 302 incidents (12%) compared to the first half of 2024. These trends indicate that firearm-pointing incidents have not demonstrated a sustained reduction over time, despite CPD's advancement in compliance.

There are also significant racial disparities in who CPD is pointing firearms at. While reports of firearm-pointing incidents involving young Black men decreased between 2020 and 2022, the rate in 2022 remained more than 6.5 times higher than that experienced by the average Chicagoan and more than 3 times higher than that experienced by Black Chicagoans overall. In 2024, Black Chicagoans comprised over 72% of use-of-force victims despite representing less than 30% of the city's population.[47]

At the same time, TRED identified that many of these incidents are unjustified.[48] In 2021, 865 of 3,005 weapon-pointing reports (31%) identified deficiencies, including insufficient justification for firearm-pointing, incomplete or inaccurate reporting, and issues with body-worn camera documentation. In 2022, 1,023 of 2,982 reports (34%) reflected similar deficiencies.[49]

Supervisory accountability required by ¶191 also remains stunted. Despite 97.5% completion of supervisor training, supervisors took corrective action at the time of the incident in approximately 1% of cases and, in some reporting periods, reported zero instances of immediate corrective action even when the IMT identified deficiencies in 1/3 of incidents.[50] This data reveals a clear gap between compliance and outcomes: while CPD advanced in compliance across ¶¶189–191 by adopting policies, completing training, and establishing documentation and review systems, firearm-pointing incidents increased, documentation gaps and reporting deficiencies persisted, and real-time supervisory intervention remained rare, while racial disparities in firearm-pointing practices continued. In order to ensure progress makes a meaningful impact, compliance could be measured by observing a sustained reduction in unnecessary firearm-pointing incidents (¶189), reviewing a sample of incident documentation for accuracy (¶190) and holding CPD supervisors accountable for consistent supervisory intervention (¶191). Without a change in how these paragraphs are assessed, there is a risk that the Consent Decree may not fully address the harms associated with firearm-pointing practices.

The IMT and the Court already possess significant authority to incorporate these considerations through compliance assessments and determinations, enforcement actions, implementation of negotiations, public reporting, and judicial oversight. These mechanisms could allow compliance advancement to more closely reflect whether firearm-pointing reforms are actually reducing harm in practice.

[45] Chicago Police Department, Tactical Review and Evaluation Division (TRED) Annual Reports (2021–2024).

[46] Chicago Police Department, *2025 Tactical Review and Evaluation Division (TRED) Mid-Year Report* (Chicago, IL: Chicago Police Department, 2025).

[47] Communities United et al., *Notice of Intent to Initiate Enforcement Proceedings Regarding Use of Force* (Sept. 22, 2025); Chicago Police Department, Tactical Review and Evaluation Division, *2024 Year-End Report* (June 27, 2025).

[48] Chicago Police Department, Tactical Review and Evaluation Division (TRED), as reported in Independent Monitoring Report 6 (IMR-6) and Independent Monitoring Report 7 (IMR-7).

[49] *Id.*

[50] Independent Monitoring Team, *Sixth Independent Monitoring Report* (IMR-6); *Seventh Independent Monitoring Report* (IMR-7); and subsequent reports (IMR-8–IMR-13), discussing supervisory intervention and corrective action in firearm-pointing incident reviews.

Case Study Two: Is CPD Transparent and Accountable with Citizen Complaints? (¶¶ 424–426)

For many impacted Chicago residents, the true test of police accountability is whether complaints about police misconduct lead to fair and meaningful consequences. Consent Decree paragraphs 424–426 were designed to address the longstanding perception that misconduct rarely results in accountability. These provisions require that complaints made against officers be courteously received, properly classified, and efficiently investigated, while also mandating accessible submission options, unique tracking identifiers, public-facing data systems, and standards for completeness and timeliness.[51]

The IMT determined that CPD and COPA achieved preliminary compliance after reviewing and approving policies governing complaint intake, classification, and tracking. COPA reached preliminary compliance after finalizing its intake and investigative policies, while CPD did so after adopting a policy governing complaint initiation and log number assignment. Secondary compliance was reached based on training development and implementation. COPA demonstrated that 99% of personnel completed revised Intake Unit training, while CPD's progress was slower, as its BIA training course underwent multiple revisions following feedback from the IMT and OAG and remained under development for several reporting periods before final approval.[52] As of December 31, 2025, CPD and COPA have reached full compliance with ¶¶424–426. Full compliance was ultimately granted after CPD launched an open-data portal, electronically linked complaint systems, automated required data fields, and demonstrated that at least 95% of officers completed accountability-focused training. The IMT verified these changes by testing the functionality of public portals and confirming that complaint data appeared accurate and complete.[53]

Community defined outcomes, however, would likely reflect a transparent and accessible complaint system that indicates measurable change over time. These changes could be measured by increased reporting from civilians, greater use of anonymous reporting options, reductions in investigative delays, or a demonstration of increased trust in the complaint process among impacted communities.

However, the data does not clearly show that the outcomes of this accountability system have changed as CPD compliance has advanced. The number of complaints COPA received remained relatively stable from 2023 to 2025, with 713 complaints in 2023, 962 in 2024, and 838 in 2025. Complaints increased in 2024 and declined again in 2025.[54] The types of complaints reported have also remained largely unchanged. From 2023–2025, complaints of civil rights violations consistently accounted for the largest share of allegations, ranging from approximately 35% to 38%, while complaints related to operations and personnel violations ranged between 32% and 39%, and complaints of excessive force remained relatively stable, ranging from approximately 14% to 17% over the same period.[55]

Demographic patterns further reinforce the consistency of reporting over time. Across all three years, Black individuals represented the largest share of complainants, while complaints were overwhelmingly filed by men and concentrated among younger age groups, particularly individuals in their 20s and 30s.[56] These patterns remained largely unchanged from 2023 to 2025, suggesting that both the volume and composition of complaints have remained consistent despite advancements in the reporting system. Taken together, this data raises questions about whether the current accountability framework is effectively expanding access to reporting or producing measurable changes in outcomes for impacted communities. Because this section requires that complaints be courteously received, it is imperative that

[51] Chicago Police Department Consent Decree, ¶¶ 424–426, at 100–103 (2019).

[52] The Bureau of Internal Affairs (BIA) is the CPD unit responsible for receiving, registering, and investigating certain categories of officer misconduct complaints. Paragraphs 424 through 426 depend not only on public-facing complaint portals, but also on CPD's internal ability to log complaints accurately, assign tracking numbers, connect complaint data across systems, and train personnel to handle misconduct complaints consistently.

[53] Independent Monitoring Team, *Independent Monitoring Report 11.*

[54] Civilian Office of Police Accountability, Data Dashboard, https://www.chicagocopa.org/data/.

[55] *Id.*

the experiences of Chicagoans who are engaging with the complaint system are taken into account. One way to achieve that would be to incorporate feedback surveys into the automated complaint system. Another way could be to facilitate focus groups or conduct individual interviews with a pool of people who have submitted complaints.

Ultimately, this case study demonstrates a central limitation of the Consent Decree's approach to accountability: it measures whether systems exist and function, but not whether they produce meaningful accountability outcomes.

Case Study Three: Is CPD Engaging with Youth? (¶ 27)

Young people, particularly those most impacted by policing, have had limited opportunities to meaningfully engage with CPD or influence decisions about public safety, despite being disproportionately affected by police interactions. Paragraph 27 requires CPD to establish regular, structured engagement with youth, especially system-impacted youth, in partnership with community-based organizations, to ensure that youth perspectives inform policing practices, build trust, and reduce harm.[57]

The IMT determined that CPD achieved preliminary compliance with ¶27 by adopting policies requiring youth engagement and establishing Youth District Advisory Councils (YDACs) across multiple districts.[58] CPD later reached secondary compliance by training more than 95% of officers through Community Partnerships eLearning and implementing systems to track and document community engagement, including partnership tracking templates and records of meetings.[59] As of IMR 13, ¶27 remains in secondary compliance. In making these determinations, the IMT reviewed policy language and documentation of YDAC activities, including meeting agendas, attendance records, and summaries, as well as training completion of data and engagement tracking systems. These assessments focused on whether CPD had established the structures, documentation practices, and training necessary to support youth engagement under the Decree. While compliance has advanced to the second stage, a more substantive showing of meaningful engagement may be required before CPD can reach full compliance. The IMT itself identified youth engagement as a "principal challenge," noting that directly impacted youth from marginalized communities were not consistently participating in CPD-led Youth Councils or broader engagement spaces.[60]

The Consent Decree Coalition raised concerns about the effectiveness and inclusivity of CPD's engagement with youth, focusing primarily on how engagement operates in practice rather than formal objections to the sufficiency of the ¶27 policy itself.[61] For example, in its feedback on CPD's General Order G02-05 (Interactions with Youth and Children), the Coalition raised concerns about whether CPD's interactions with youth are developmentally appropriate, equitable, and reflective of meaningful engagement, including concerns about officer discretion, the quality of interactions, and the absence of clear mechanisms to ensure youth input meaningfully informs decision-making.[62] While not directed specifically at ¶27 compliance determinations, these concerns reflect broader skepticism about whether existing engagement structures are sufficient to produce meaningful outcomes for youth.

[56] Id.

[57] Chicago Police Department Consent Decree, ¶ 27, at 16 (2019).

[58] General Order G02-03 "Vision, Mission Statement, and Core Values"

[59] *Independent Monitoring Team, Independent Monitoring Report 11*

[60] Independent Monitoring Team, *Independent Monitoring Report 12*

[61] ACLU of Illinois, *Chicago Police Department Consent Decree: Community Engagement- Youth Interactions.*

[62] Chicago Consent Decree Coalition, *Letter Regarding CPD Youth Interactions Policy (General Order G02-05)* (June 20, 2023).

For young people, we agree that meaningful youth engagement cannot be measured by the mere existence of a meeting space. Rather, compliance should demonstrate that youth, particularly those who have experienced policing by being stopped, subjected to surveillance, or harmful police contact, are consistently participating in engagement opportunities. During listening sessions, community members were clear that these engagements should be shaped by youth and be conducted in a way that makes them feel both safe and empowered. This may mean that CPD is not directly involved. The feedback received during these engagements should be consistently recorded, and CPD should demonstrate how the feedback was considered and/or incorporated into public safety solutions.

The IMT's compliance framework allowed CPD to advance to secondary compliance based on policy adoption, eLearning training, and documentation systems without requiring evidence that these structures were effectively engaging directly impacted youth or meaningfully changing policing practices. At the same time, the IMT has recognized this need, indicating that it will assess whether community input is meaningful and influential, including whether YDACs and District Advisory Councils are actively shaping Department-wide strategies before granting full compliance.[63] Moving forward, the parties should require evidence from CPD that youth engagement was effective, inclusive, and meaningfully influential in shaping policing practices.

This case study illustrates a central limitation of the Consent Decree's approach to youth engagement. It requires CPD to build structures but does not yet require evidence of how the youth engagement system will ensure that youth, particularly system-impacted youth, feel included, safe, heard, or have the ability to influence policing decisions. The IMT's recent statements indicating greater interest in assessing whether youth engagement structures meaningfully shape department-wide strategies demonstrate that the current framework already allows for a more substantive and outcome-oriented approach to evaluating youth engagement compliance.

Case Synthesis

Across all three case studies, a consistent pattern emerges. Chicago's Consent Decree compliance framework has primarily measured procedural compliance: whether CPD has issued policies, met training thresholds, activated required systems, and satisfied audit standards. It has not consistently required CPD to demonstrate how these procedural systems will address the underlying behaviors these paragraphs are meant to change, such as aggressive firearm pointing, ineffective complaint accountability, or limited youth engagement.

Chicagoans impacted by policing, in contrast, have defined successful Consent Decree compliance as reduced harm, measurable reductions in racial disparities, and increased trust. This report identifies a disconnect between how community members define success and how the IMT determines compliance begs the question of how CPD can exit court-ordered monitoring without demonstrating meaningful changes in the outcomes the Consent Decree was designed to address.

The existing compliance structure already provides substantial authority for the IMT and the Court to operationalize more outcome-oriented oversight practices. Through compliance assessments and determinations, audits, enforcement actions, negotiated implementation expectations, and judicial oversight, these entities can more consistently require evidence that reforms are reducing harm, addressing disparities, strengthening accountability, and improving community trust before advancing compliance.

[63] Independent Monitoring Team, *Independent Monitoring Report 13* (2026) ¶ 15, at page 46.

Conclusion

The Chicago Consent Decree was established because, for decades, CPD engaged in unconstitutional practices, including widespread misconduct and discriminatory policing in Black and Latiné communities. This report shows that seven years into the Consent Decree, CPD has made procedural progress through adoption of new policies, training, and the creation of internal systems. While these are important steps, we have yet to see them consistently translated into meaningful changes in the lived experiences of Chicagoans directly impacted by policing. Although many of the harms examined throughout this report have disproportionately impacted Black and Latiné Chicagoans, the consequences of ineffective policing practices and incomplete reform efforts extend far beyond any single community. When policing systems fail to reduce harm, build legitimacy, and establish meaningful accountability, public trust erodes across the city, weakening the effectiveness of public safety institutions overall. Ensuring that Consent Decree compliance translates into meaningful outcomes is therefore not only a matter of racial justice, but also a matter of building safer, more trusted, and more effective systems of public safety for all Chicagoans.

The problem is not simply that CPD is slow or uneven in complying with the Decree. Rather, the central challenge lies in how compliance has been evaluated. The IMT has not historically and consistently incorporated lived experiences as paragraph-level indicators in compliance assessments, nor has it consistently required evidence that CPD's policies, training, and implementation are producing measurable improvements in practice. While the IMT has recently indicated that future reporting will place greater emphasis on operational impact and outcome-based assessments, this shift remains emerging and has not yet been fully operationalized within compliance determinations. As a result, CPD can be said to have reached compliance in a certain category without clear evidence that the outcomes have meaningfully improved in the areas those provisions were meant to address. It is important to acknowledge that the Consent Decree is a legal tool. It is not equipped to cement all the changes that community members have expressed concerns about, and delays in progress are costly. However, as demonstrated in this report, there is more that can be done and must be done to address key concerns facing community members such as use of force and misconduct before advancing the Department to full compliance.

The legitimacy of the Consent Decree does not rest on whether CPD has built the right infrastructure on paper; it rests on whether the Consent Decree is changing what community members experience in practice. Moving forward, the responsibility for strengthening the effectiveness of the Consent does not rest with any single institution. The IMT and the Court both play a significant role in determining how compliance is evaluated, enforced, and operationalized. These agencies must use the authority and mechanisms already available within the current framework to place greater emphasis on community-defined outcomes, operational impact, and measurable reductions in harm when assessing reform progress. By failing to do so, Chicago risks reaching formal compliance without delivering the substantive change the Consent Decree was intended to secure.

Recommendations for Stakeholders

Moving forward, the Court and the Independent Monitor should work within their power to require evidence of substantive change across each semi-annual reporting cycle when assessing compliance by:

1. Adopting community-defined outcome metrics as a core component of compliance assessment.

Community-defined outcome metrics should assess whether reforms are reducing unnecessary force, narrowing racial disparities, improving accountability, increasing transparency, and rebuilding trust in communities most impacted by policing. Paragraph priorities and metrics for assessment should be informed by community testimony, Coalition submissions, and OAG oversight recommendations, and should be disaggregated by race, age, gender, geography, and police district wherever possible. For example, use-of-force data could be broken down by race and age to compare rates of force against young Black men

relative to other groups. Metrics further analyzed by police district to identify where disparities are most concentrated.

To ensure these outcome metrics are enforceable and do not unnecessarily extend the Consent Decree indefinitely, the IMT should ensure that they are achievable and time limited. Discussion around outcome metrics should be incorporated into regular reports alongside policy and training compliance to evaluate whether reforms are producing meaningful, measurable changes in practice.

Recognizing that this approach may not be appropriate or feasible for every paragraph, the use of extended outcome-based evaluation should be prioritized for provisions where community members have consistently raised concerns about gaps between formal compliance and their lived experience. These priority areas include, but are not limited to, use of force and weapon discipline (¶¶188–192), misconduct intake and accountability systems (¶¶424–426), and youth engagement (¶27). Focusing on comprehensive evaluations in these areas would allow for more targeted use of resources and time, while ensuring that the most critical reforms are assessed for both implementation and real-world impact.

This approach aligns with practices in jurisdictions such as Cleveland and Baltimore, where the Consent Decrees require ongoing measurement of outcomes.[64] In Cleveland, the Consent Decree requires the Monitor to assess outcome measurements and conduct biennial community surveys to evaluate whether reforms are improving police-community trust and reducing excessive force. In Baltimore, the Consent Decree requires regular analysis of data on stops, searches, arrests, and use of force, along with community surveys, to determine whether reforms are producing measurable improvements in policing outcomes.[65]

2. Use the Consent Decree's comprehensive assessments as a substantive tool to identify and operationalize outcome-based improvements to specific provisions.

Comprehensive assessments are periodic, in-depth evaluations conducted by the IMT to assess CPD's progress within specific reform areas, identify barriers to effective implementation, and inform whether modifications to policies, practices, or the Consent Decree itself may be necessary.[66] While the IMT's semiannual reports provide systemwide updates on compliance status across all provisions, comprehensive assessments are designed to offer deeper, topic-specific analysis of how reforms are functioning in practice and where improvements are needed. These assessments are intended not only to evaluate implementation, but also to provide an opportunity to refine and strengthen the Decree over time.

To fully realize their intended purpose, The IMT must draft the comprehensive assessments to evaluate whether particular paragraphs are producing their intended results and to identify where existing requirements may be insufficient to drive meaningful change in practice. Where assessments reveal persistent gaps between formal compliance and lived experience, the IMT should use these findings to recommend targeted refinements to implement strategies, compliance criteria, or supporting policies to better align with outcome-oriented goals. This may include clarifying expectations for effectiveness, incorporating outcome metrics into sustained compliance determinations, or identifying where additional guidance or modifications are necessary to ensure that reforms are producing measurable improvements in safety, fairness, accountability, and community trust.

In this way, comprehensive assessments can serve not only as evaluative tools, but as a structured mechanism for advancing the next phase of implementation ensuring that compliance evolves from procedural compliance to demonstrable impact.

[64] United States v. City of Cleveland, Consent Decree (N.D. Ohio May 26, 2015); United States v. Police Department of Baltimore City, Consent Decree (D. Md. Jan. 12, 2017).

[65] *Id.*

[66] Chicago Consent Decree ¶¶ 657–660.

3. Strengthen mechanisms for stakeholder accountability to the public by clearly demonstrating how community input informs compliance analysis, corrective action, and implementation decisions.

Chicagoans directly impacted by policing, the Consent Decree Community Coalition, and the OAG have repeatedly identified the same concerns about policing practices and the effectiveness of Consent Decree reforms: excessive force, racial disparities, weak accountability, shallow engagement, and skepticism about whether reforms will produce lasting change. Many have expressed concerns that participation has too often functioned as consultation without visible influence on decision making.

To address this gap, the Court, IMT, and CPD should adopt a more transparent process that documents how community feedback is incorporated into key compliance assessments and implementation decisions. This should include transparently and consistently identifying:

- the input received from community members and stakeholders;
- how that input informed compliance determinations, corrective actions, or implementation strategies; and
- where recommendations were not adopted, the rationale for those decisions.

Recognizing concerns about the accessibility and length of monitoring reports, this information should not simply be added to existing reports, but instead presented through targeted, publicly accessible summaries or supplemental materials, particularly for provisions that have been consistently raised by community members as important. This approach would build on prior efforts, such as the IMT's reporting on the 2020 protests, which provided a more focused, transparent analysis of issues of significant public concern.[67] By making these connections visible, this process would ensure that stakeholders are accountable to the public and that community engagement functions as a substantive mechanism for oversight and influence, rather than a procedural requirement.

Call to Action for Community Members and Advocates

Community members and advocates remain essential to ensuring that reform is defined not by paperwork, but by reductions in harm, disparities, and distrust. Our call to action for community members and advocates is as follows:

1. Participate in public Consent Decree meetings and hearings to ensure that community experience remains part of the official record.

Community members directly impacted by policing and advocates should continue attending IMT hearings, submitting public comments, and participating in public meetings related to the Consent Decree so that CPD's own reporting or procedural benchmarks are not the only factors determining compliance. Understanding that everyone is not willing or able to participate in these spaces, consider sending a written comment or sharing your concerns with someone who can voice them on your behalf. These public oversight spaces are especially important when CPD seeks advancement to higher levels of compliance or when stakeholders claim that reform areas are functioning effectively. At those moments, residents and organizations can help ensure that lived experiences, neighborhood realities, and directly impacted voices remain central to how progress is determined.

2. Advance community-driven, outcome-based accountability by ensuring community participation meaningfully shapes how reform is prioritized, implemented, and evaluated.

Community engagement should not end with public testimony alone. Community members and advocates should continue pressing the Court, the IMT, the city, and CPD to demonstrate how community input directly informs compliance determinations, corrective actions, and implementation decisions. This is especially important as the IMT has recently indicated

[67] Independent Monitoring Team, *Special Report: The City of Chicago's and the Chicago Police Department's Responses to Protests and Unrest under the Consent Decree (May 2020–November 2020)* (July 20, 2021), https://cpdmonitoringteam.com/wp-content/uploads/2024/03/2021_07_20-Independent-Monitoring-Team-Special-Report-filed.pdf.

How Chicagoans Can Hold Stakeholders Accountable

Chicagoans play a critical role in ensuring that Consent Decree reforms lead to meaningful change. Community members and advocates can push, the Court, IMT, City, and CPD, through the following actions:

Participate in public hearings and meetings
Attend IMT public hearings to uplift gaps between reported compliance and lived experience, and raise concerns about how reforms are being implemented.

Submit written comments and coalition input
Provide written feedback to the IMT, OAG, and coalition partners, especially in response to monitoring reports and key reform updates.

Request meetings with Consent Decree Stakeholders
Seek meetings with City officials, CPD leadership, and oversight bodies to discuss specific concerns and advocate for changes in policy and implementation.

Engage through organized advocacy efforts
Join or support coalition-led campaigns that elevate community priorities and push for accountability across multiple stakeholders through unique tactics.

that future reporting will place greater emphasis on operational impact and outcome-based assessments. Community participation can help ensure that this shift is meaningfully defined, consistently applied, and grounded in lived experience.

By implementing these recommendations, we believe the Consent Decree is far more likely to achieve its intended purpose of transforming the Chicago Police Department. Incorporating community-defined outcome metrics, strengthening the use of comprehensive assessments, and improving transparency around how community input informs decision-making would help align the compliance process with the lived experiences of those most impacted by policing. Together, these changes would support a more accountable, data-informed, and community-centered approach to reform, one that not only measures implementation, but demonstrates measurable progress in reducing harm, narrowing disparities, and strengthening accountability.

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