



October 29, 2018

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Mr. Edward N. Siskel
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RE: City of Chicago Police Department Independent Monitoring Proposal – Supplemental Information

Dear Ms. Hendrickson and Mr. Siskel:

Thank you for the opportunity to respond to the questions you posed to the Coar Monitoring Team during the October 22, 2018 phone conference with Ms. Scruggs and Mr. Slagel, and representatives from both party's staff. Please find our responses below.

1. We would like to hear more about your effectiveness as team members and as a group.

Our approach to monitoring and reform is fundamentally grounded in a team-based methodology for assessing the organization and understanding the root causes identified in the City of Chicago Consent Decree Agreement (Agreement). After identifying, documenting and reporting our findings, we will work to help the Chicago Police Department (CPD or Department) (1) resolve or mitigate those causes, (2) focus its internal priorities on reform while still maintaining core day-to-day police operations, (3) assess its efforts in implementing required reforms, and (4) engage the community to ensure its voices are heard and its members are engaged and invested in this process.

Our experience demonstrates that a highly collaborative and engaged team plays a crucial role in helping ensure that the Department's personnel, processes and practices target and achieve both the immediate operational requirements and Agreement-mandated change. In conjunction with that engagement, our team will maintain a significant and sufficient presence within the Department, which has the greatest ability to either advance or undermine the Agreement's success.

Think of it this way: in any organization, employees spend their entire day just doing their jobs. Generally, when asked to embrace change, most view the new demand as a job-and-a-half or a doubling of their duties. Our team-based methodology compensates for such systemic and behavioral roadblocks to change by using a collaborative and in-person approach to help Department leaders view their decision options more broadly. We help them remain vigilant for opportunities to achieve both operational and Agreement objectives at the same time through the same expenditure of resources. When police leaders view both operational and change objectives as synonymous, reform accelerates.

This effort requires individuals who are informed, committed and present – not just collectively as a team but also personally as professionals deeply committed to the Monitor's goals. The leadership and experts we have invited onto the team we built for Chicago thrive in this teaming environment and have previously worked together to address many, and perhaps all, of the challenges we expect to encounter. Most



importantly, every single one of these experts knows that driving lasting change at this level of complexity requires many hands on the oars and a disciplined, adaptive and synchronized approach to achieving the Monitor's mandate.

To enhance this effectiveness as a team, we use a highly collaborative, cross-functional approach that includes the input of team members with a diverse history of experiences and perspectives on police reform. Our subject-matter experts (SMEs) are highly skilled and experienced in a variety of policing issues. By informing and engaging them across the range of Chicago Consent Decree (CCD) activities, our SMEs gain a better, high-level view of the Department's challenges and opportunities and greater insight into how the Monitor's team can complete its tasks.

Our on-the-ground practices include weekly kick-off meetings with all SMEs – and stakeholders when appropriate – to establish the assignments and goals for the current and following week across the Monitor's planned activities. Meeting attendees also review a series of progress reports including, but not limited to, ongoing project status updates, burn-rate forecasts, subject-matter research assignments and emerging issues and findings. Both the U.S. Department of Justice (DOJ) and the client departments we have served in collaborative reform have continuously rated our teams highly in effectiveness and collaboration.

2. Explain project management time spent off site versus time on the ground.

We use a dual project management approach: one facet addresses the actual operational performance, and the other establishes the appropriate oversight and measurement mechanisms. Creating lasting reform in a three- to five-year period is an aggressive and complex task. Coar Monitoring Team (CMT) member Hillard Heintze has experienced firsthand – on many engagements – that a constricted time frame, while difficult, keeps the topic of collaborative reform front and center and encourages positive engagement within the department. Although the structure and goals of the U.S. Department of Justice (DOJ) Office of Community Oriented Policing Services (COPS Office Collaborative Reform Initiative for Technical Assistance (CRI-TA) assessments were distinct from monitoring, Hillard Heintze succeeded in implementing complex reforms in major cities by leveraging focused, deliberate and consistent project management in a manner that addressed the need for site-level tasking and reporting and project-level reporting and measurement. The CMT views this project management approach as vital for this Monitoring engagement.

We have two project managers with hours budgeted to the project. Natalie Fouty, a Chicago-based employee, will spend more than 1,000 hours on the ground in Chicago. She will work with the team's leadership and experts to ensure tasks, site visits and community meetings are scheduled, coordinated, documented and successfully completed while also handling a multitude of other administrative responsibilities. Lindsay Morgan, PMP, is an experienced and accomplished project manager. She will supervise and guide Fouty and work closely with the monitor and leadership team to drive project excellence. Morgan is based in Washington, D.C. However, we do not believe significant travel is required for her work. She has been assigned 280 hours, 200 of which will be used off-site.



This specific project management process allowed Hillard Heintze to complete nine complex CRI-TA projects across the country on time or early and on or under budget. Morgan and the firm received “excellent” performance ratings in the Federal Government Contractor Performance Assessment Reporting System (CPARS) from the COPS Office for their work and project management process. We are confident this project management process is a key to success and a differentiator of our services and reform methodology from those of others.

3. How will we address impartial policing and crisis intervention?

We will use a traditional assessment approach, as detailed below. This process is evidence-based and seeks to identify how effectively the policies and protocols are engaged in actual practice. We have experts experienced in these issues, both from a police practice and reform perspective as well as an academic and data-centric one. Our Co-Lead on Critical Incident Technique (CIT) Amy Watson has been conducting CIT interviews, ride-alongs and observing dispatchers to assess and report on CIT issues in Chicago for the past decade.

- **Document Review and Data Analysis:** The Coar Monitoring Team will conduct a document review of policies, procedures and training curriculum related to bias. As part of the document review, our team members will examine how community complaints regarding potential bias are addressed. Our team members will evaluate Chicago Police Department (Department) practices and its organizational approach to addressing bias. They also will conduct an analysis of CPD’s arrests, traffic stops, use-of-force incidents and pedestrian encounters to identify trends or patterns of bias. Then, they will compare their findings to national best practices, particularly with respect to identifying bias and creating changes in behavior and interactions with the community.

In addition to the document review, our team will assess the Department’s training on implicit bias and how it (1) integrates this training into policy, (2) creates accountability measures and benchmarks, and (3) obtains continuous feedback from the community and the Department. This involves conducting a variety of interviews with key Department members and stakeholders within City government, such as the Civilian Office of Police Accountability (COPA), the Chicago Police Board, partner governmental agencies and elected officials.

- **Interviews and Focus Groups:** Our team members will conduct interviews and focus group sessions with CPD personnel at all levels, including recruits, line officers, supervisors and command staff, and will meet with a variety of community organizations and members throughout Chicago. Where available and appropriate, we also will consult previous efforts in this area to avoid losing recent historical data from interest groups that focuses on bias and crisis intervention.
- **Ride-Alongs:** Members of our team will participate in ride-alongs to observe officers during their routine interactions with community members and sit-alongs at OEMC to observe protocols for identifying CIT calls and dispatching CIT-certified officers.
- **Scientific Analysis:** Our team members will conduct a rigorous scientific analysis of quantitative data predicated on known factors that reflect potential bias in policing decisions. Our team will review these factors to determine if they indicate disparate practices within the



CPD. Our team members will request and examine data sets, including data on stops, arrests, officer characteristics, reported crime, traffic collision, deployment and U.S. Census results. As outlined in Question 5, we have several professionals on the team with experience interacting with Chicago law enforcement data.

- **Body Camera Footage:** Our team will develop a plan to randomly sample body-camera footage for interactions with the public and with individuals on CIT calls. The team members will use standardized assessment guides to code the footage while looking for adherence to legal standards and for compliance with departmental policy and national best practices. In addition to reviewing the body camera footage, the auditing process also will serve to estimate the frequency with which CPD officers are failing to activate or appropriately categorize body camera footage for retention.

Our results on this topic will be reported at the end of Year 1, and they will guide our work in Year 2 and Year 3.

Please see the response to Question 7 for the crisis intervention specific response.

4. An evaluator was concerned about your broad approach to the Consent Decree – which does not seem to stay strictly within the boundaries of the Monitor’s role.

We do not view this as a mutually exclusive approach. A Monitor reports to the court on ordered reform requirements. We recognize this as our primary role and responsibility. However, we believe that true reform requires engagement, not just measurement.

We are 100 percent focused on one single, strategic objective: to ensure the CPD fulfills its responsibilities under the Agreement in a way that facilitates lasting reform. A collaborative approach does not mean honest and critical reporting of activities does not occur. Rather, critical reporting is accurate and delivered in a timely manner designed to assist in the Department’s success.

We use a methodology that has successfully driven reform in many cities across the country. The topics we address in our proposal and our persistent presence on the ground are critical in helping the City and the Department successfully identify and implement reforms. We concur that this is different from traditional approaches to monitoring – which some might characterize as a “hands-off, check the box” approach. As the outcomes of many other monitoring engagements have demonstrated over the past few years, the traditional approach significantly raises the risks related to (1) extended review timeframes, (2) increased costs and (3) missed opportunities to resolve even basic obstacles for long-term success.

If selected, we recognize that we will be responsible for working under the Consent Decree parameters. In addition to reporting to the Court, we will ensure the Department and the City (1) have clear guidance on the technical areas that require change; (2) have access to the best practices, training and experts that can help them facilitate change; and (3) receive an honest evaluation of their progress in a manner that guides the agency in real reform. We believe this is our responsibility and duty as Monitor. We recognize and respect the parameters of the CCD. Our approach and hours were formulated with those parameters in mind, not an expansive view of the Monitor’s role.



5. What is the CMT's capacity and experience on legacy IT systems?

Legacy IT systems are an inherent challenge for law enforcement agencies, including those we have dealt with across the country. The CMT has a range of expertise in law enforcement data, including specific experience with CPD data. We recognize the challenge of data as well as the need for identification of how and where it is stored and how it is to be accessed. The Department has some strengths around its data, but its administrative data, including figures focused on accountability, is less robust. We address these issues on nearly every engagement – and have extensive experience in this regard.

CMT member BRG has tremendous depth in dealing with large volumes of disparate data. In fact, Jeffrey Cramer has worked with data from the Chicago Crime Lab as part of his responsibilities as co-coordinator of DOJ's Project Safe Neighborhoods. Moreover, CMT member Hillard Heintze has experts in law enforcement data, including CPD data.

Kenneth Bouche, of Hillard Heintze, served as the Chief Information Officer for the Illinois State Police (ISP) and led the technological advancement of the ISP and statewide law enforcement agencies. His division was responsible for consolidating, modernizing and standardizing all of the ISP's technology functions, as well as the delivery of critical real-time information to more than 1,000 police agencies in Illinois. This process specifically had to map the use of legacy data as part of the modernization of the ISP technology approach. Bouche directed the rebuilding of several failing information and intelligence systems; implemented a project management and quality assurance office as well as a strategic planning office; and created several public and private partnerships to reduce cost and increase effectiveness of technological programs. Several of these partnerships serve as models across the country today. Additionally, Bouche led the ICLEAR initiative in which CPD data was extracted and entered into a statewide system that was distributed to local law enforcement agencies across the state. This effort deeply enhanced local law enforcement agencies' ability to understand criminal patterns and behavior that transcended multiple jurisdictions. This required a strong fundamental understanding of the CPD data – how it is captured and, more importantly, how it is stored.

Bouche led technology advancement in Illinois through ISP and as the Chairman of the Illinois Integrate Justice Information Sharing Initiative (ILJIS). He also served as a member the national Integrate Justice Information Sharing Initiative (IJIS). Bouche served as a member the IJIS Institute's Board of Directors from 2009 to 2013 and as Chairman of the Global Justice Information Sharing Initiative, which is an advisory committee to the U.S. Attorney General on justice information sharing and integration initiatives. Bouche led the development of the National Criminal Intelligence Sharing Plan and the Fusion Center Guidelines, which are the current standards for intelligence sharing in the United States. He also oversaw the development of subcommittee projects, such as the development of Global Justice XML and National Privacy Standards. This group was tasked with helping to identify and establish data standards for analysis across the disparate IT systems of law enforcement agencies across the country.

Steve Bova, another CMT expert, served in ISP as the Bureau Chief of the ISP's Information Services Bureau. In his ISP role, Bova was responsible for architecture leadership, management and delivery of an average of 54 million law enforcement transactions to 44,000 officers across Illinois. Bova led the, governance and implementation strategy aspects of the Chicago Police data conversion for ICLEAR, which was an early



transition of legacy data held by the CPD. In his capacity as Bureau Chief, Bova served on the Board of Directors for the National Law Enforcement Telecommunications System (NLETS), the national interstate justice and public safety network for the exchange of information related to law enforcement, criminal justice and public safety. Bova also was a key member of the Information Technology Committee for NLETS. In this role, he addressed and resolved data exchange issues across the 50 states.

The expansion of technology in law enforcement has generated a multitude of system challenges – legacy systems, software incompatibility and identification and usage of good data. Members of our team have successfully worked with disparate data from police agencies on bias, use of force, staffing and many other issues to understand, analyze, measure and improve agency and officer behavior. Often, our data analysts extract raw data from the backend of the legacy system when the application is incapable of exporting usable, accurate data. We believe few proposals can compete with the CMT's capacity in the area of data examination, especially on legacy systems, or its understanding across the range of policing and law enforcement data, its challenges and the need for accuracy as a means of measurement for organizational performance.

6. Why is Grande Lum tasked to Crisis Intervention if he is an expert in Community Engagement?

Although Lum is an expert and national leader in community engagement, he also has extensive expertise in crisis intervention gained from his community engagement work. While working with the DOJ's Community Relations Service (CRS), he managed and led crisis intervention in police-community disputes, including incidents involving individuals in crisis. We believe his well-rounded background brings a strong skill set and broad perspective to this team.

Using his skills in mediation, dialogue facilitation, cultural competency training and crisis intervention technical assistance, Lum provided valuable insights into the unique challenges facing police when interacting with individuals in crisis. These challenges could involve individuals in the midst of mental health crises or during strife-filled incidents and community flashpoints, such as those following the deaths of Trayvon Martin in Sanford, Florida; Michael Brown in Ferguson, Missouri; and Freddie Gray in Baltimore, Maryland.

Personally working on the ground during these incidents shaped Lum's understanding of the need for a fully functional crisis intervention team (CIT) to ensure the safety and well-being of the community. Lum will co-lead Crisis Intervention with University of Illinois – Chicago Professor Amy Watson, Ph.D., who is a national expert in crisis intervention and in matters involving the CPD. Watson brings to this critical topic deep experience and leadership in data-collection, field interviews and program implementation, compliance monitoring and evaluation.

All of our teams are under the management umbrella of the CMT leaders, but we feel that the experience and vision of the key team members in CIT bring a holistic approach to this significant issue.



7. How will we address Crisis Intervention and do we have sufficient hours and resources allocated for this priority?

Based on our understanding of the effort and time required during the first year of the Consent Decree, we believe the hours and resources we allotted to crisis intervention and CPD's Crisis Intervention Team program are appropriate. We understand the Agreement stipulates that the CPD must develop a CIT Implementation Plan based on its analysis of the demand for crisis intervention services within 180 days of the effective date.

Based on this stipulation, the Monitor's primary responsibility in the first year will be to (1) review and approve the CIT report within 180 days of the CPD's completion of this plan, and (2) publish the report to the public within 45 days of the report's submission.

Additional Monitor responsibilities will include, but not be limited to, ensuring the following.

- 1 CPD's momentum on policy and procedures compliance or development, including the development of new policies based on problems and solutions identified by the Crisis Intervention Response Advisory Committee.
- 2 CPD's CIT officer selection process is consistent with Consent Decree and Illinois Law Enforcement Training and Standards Board (ILETSB) requirements for CIT officer certification;
- 3 CPD's CIT training is implemented according to best practices and ILETSB requirements.
- 4 CPD's development of the CIT Refresher Training, with input from the Crisis Intervention Response Advisory Committee, to ensure all certified CIT officers receive up-to-date training in current best practices when interacting with individuals in crisis.
- 5 CPD's use of tactical de-escalation skills (e.g., maintaining distance and moving slowly), which is one of the most common ways departments demonstrate they have "successfully" implemented CIT. A more critical and necessary change in behavior is verbal de-escalation skills, which are more impactful in reducing use-of-force encounters. However, these skills are often more difficult to implement as officers must be convinced to change the way in which they communicate with individuals.
- 6 CPD's comprehensive data analysis of CIT reports and chain-of-command reviews.
- 7 CPD's development and maintenance of an adequate infrastructure to support the CIT program, CPD's collaboration with partner agencies and organizations, and CIT-certified officers in the field.
- 8 The Department and City's provision of appropriate, comprehensive mental health and CIT awareness training for all telecommunicators at least once a year.
- 9 CPD's continued development and implementation of pre-service academy and in-service training for non-CIT officers (with input from the Crisis Intervention Response Advisory Committee), is adequate to prepare personnel to interact with individuals in crisis and access CIT support when indicated.

Based on this projected workload for the first year, we believe our planned hours are sufficient to properly address the Monitor's duties in this regard. After the first year, the assessment of the CPD's progress – not



only in policy and training, but also in practice – will begin, and the hours will be adjusted accordingly, as larger action items and CIT implementations are addressed and rolled out.

Our team will also conduct thorough review of CPD and OEMC policies, procedures and training curriculum related to mental health crisis response. The team will examine CPD's practices and overall organizational approach to responding to mental health crisis and other incidents involving persons with mental illnesses in the community. It will review data systems for tracking mental-health-related contacts and response to identify trends and patterns and CPD, OEMC and mental health system capacity issues. CMT members will pay particular attention to identification of CIT calls, CIT officer response, patterns of use of force, call outcomes and the involvement of partner agencies (e.g., CFD, mobile crisis) in mental health crisis response. The team will also review the incorporation of advisory committee recommendations, data analysis, and community feedback into the ongoing operation of the CIT program.

The majority of police encounters address some form of a person in crisis and the accompanying issues that are prevalent in Crisis Intervention programs for law enforcement. The range of matters covered under this Consent Decree touch upon factors that are present in many aspects of Crisis Intervention – such as use of force, impartial policing and community policing – and that have a role in ensuring appropriate police action for individuals in crisis.

While crisis intervention is not a stand-alone issue, the CIT program is a specific function within broader patrol functions – to manage the demand for response to persons experiencing mental health crisis in the community and those with mental illnesses who come to police attention for other reasons. Thus, CPD must maintain adequate infrastructure to support this – which includes policy, training, and continued partnership with other agencies as well as the use of data to examine trends, identify issues and determine if CIT program capacity is adequate. It also requires support to officers who are implementing CIT in the field and continued engagement with the community. We believe the above approach and requirements integrate well as part of a holistic method to improve the CPD's interactions with individuals in crisis.

8. Why is Rob Davis on Data Analytics?

In our proposal, Rob Davis is specifically assigned to use of force. However, Davis is a highly experienced, former major city police chief and a seasoned expert in a very wide range of policing domains. He will serve in a variety of functions in our examination of the Department. In the past eight years, Davis has led the Hillard Heintze Law Enforcement Practice. In that role, he leads data experts and reviews complex data findings. We have no doubt he will add value in this area, but he is not a data expert, nor is this his main assignment. Our SMEs have broad experiences so most, if not all, can add value beyond their main focus when required. As noted in our Proposal, Responses to Supplemental Questions and this submission, the CMT brings a wealth of data credentials. Davis' input may be beneficial.

9. We question some of the SMEs' capacity to do work in Chicago, particularly T. Bowman and Grande Lum.

We spent significant time with our experts – and have double-checked with them – to ensure they can meet our time requirements they have both the capacity and approval to commit to the CCD if they are employed full time. We are confident the entire team – every single member – has the capacity to deliver

on its time commitments.

Bowman is retired from full-time work and has committed to a minimum of 1,000 hours annually on the CCD. We understand Bowman has some commitments in other cities on reform or Consent Decree projects. However, we discussed these with him and do not believe they will create a conflict. On the contrary, his work in in other Consent Decree projects can provide additional nationwide perspectives to key measures of the CPD and the CCD. We have no concerns about his commitment.

Lum is limited to the 280 hours committed to this project. These hours have been approved by his employer, and we have no concerns about his commitment.

10. Megan Maury's experience to address impartial policing.

The term "impartial policing" generally first brings to mind a program or methodology for combating racial bias through bias awareness and professional, respectful policing. Our team recognizes that racial bias is the most prevalent concern and will be a significant focus. However, successful impartial policing requires more than just a solution to race-based bias. Minority groups – based on race, gender, sex, religion, disability and many others – do not exist in individual vacuums. They intersect on multiple levels, creating the need to have the appropriate training for law enforcement officers on thoughts, words and actions that are appropriate, respectful and inclusive when interacting with the community at large.

Maury's experience as the Policy Director and Criminal and Economic Justice Project Director for the National LGBTQ Task Force has included firsthand work with socially oppressed minority groups that intersect on a daily basis. Maury's work has included combatting the disproportionate impact of the criminal justice system on LGBTQ people of color and creating economic policy agendas to help minority groups living in poverty. Maury's efforts, however, are not limited to the LGBTQ community, but rather they include non-LGBTQ African Americans, Hispanics and other affected segments of our society.

Maury leads a national coalition on public housing and the rampant homelessness issue that disproportionately affects minorities. Simply due to their housing situations, these individuals are more likely to interact with law enforcement and, therefore, are more prone to the subtle – or not-so-subtle – biases officers bring into these interactions, implicit or not. Through experience with these minority populations, Maury is an authority on how to be impartial while policing and to treat all minorities with respect.

Maury's career has led to deep relationships and professional connections with the heads of federal agencies, including the Department of Housing and Urban Development, the DOJ and the Bureau of Prisons. These agencies have sought Maury's expertise in impartial policing training in cities such as San Francisco, where Maury served as an invaluable resource in building the police departments' impartial policing training curriculum.

While serving as an impartial policing expert in the San Francisco Collaborative Reform Assessment, Maury did an excellent job of leading the public, the San Francisco Police Department, SMEs and data analysts to present a complete picture of the issues in San Francisco. We have no doubt that Maury is capable of doing



the same work in Chicago.

Thank you for the opportunity to provide additional input on our approach and capabilities. We look forward to providing even further insight during the interviews this week.

Sincerely,

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