



March 24, 2021

Antoinette Ursitti
Deputy Chief of the Training and Support Group
Chicago Police Department
3510 S. Michigan Avenue
Chicago, Illinois 60653

Re: Needs Assessment for Chicago Police Department 2022 Training Plan

Dear Deputy Chief Ursitti:

We are grateful for the Department's interest in COPA's feedback on upcoming Department training initiatives. We continue to see value in collaborating with the Department in the identification of training opportunities to improve outcomes for both Department members and the residents of Chicago.

As a general matter, COPA recognizes the efforts the Department has made to address the issues we have previously raised about its training initiatives. To recap, regarding the Department's 2021 Training Plan, COPA recommended the following:

- Additional unit-specific trainings on existing topics of foot pursuits, concealed carry stops, and search warrant execution;
- Revisions to Department-wide training and standards regarding report writing to increase accuracy and completeness of Department member reports; and
- Increased focus on development of tactical skill and capabilities of SWAT members to promote the sanctity of life principles espoused by the Department, to include implementation of less lethal force options.

I also reiterate my appreciation for the opportunity to review the Department's Fourth Amendment training, for which COPA provided feedback on October 1, 2020. Expanding on that prior feedback, COPA encourages the Department to continue to fine tune their approach to Fourth Amendment training by incorporating concepts of problem-based learning, introducing metrics to measure Department member comprehension, and evaluating the appropriateness of class size and location in order to maximize opportunities for comprehension (i.e., determine feasibility of providing content to smaller, more targeted groups of Department members).

For the Department's 2022 Training Plan, COPA makes these additional recommendations to further enhance the Department's existing training efforts:



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Handling Incidents Involving Off-Duty Department Members

Through its investigations, COPA has identified occasions in which officers and supervisors responding to incidents involving off-duty Department members have displayed a lack of objectivity in assessing and handling the member and victim(s) involved. COPA recommends the Department find opportunities through training to reinforce the principle that the credibility of off-duty members must be based on impartial assessments of objective evidence and *not* on their status as members of the law enforcement community. Domestic incidents involving Department members, as well as off-duty firearm discharges, are areas of particular concern. COPA encourages the Department to ensure trainings tackle issues of policing culture, such as unwarranted deference to off-duty members, as part of its larger effort to reform the Department and build public trust, legitimacy, and accountability within its ranks.

Fourth Amendment – Invasive Searches

Through its investigations, COPA has identified concerns related to invasive searches, such as strip searches and “reach-in” searches that go beneath undergarments. Consistent with COPA’s prior recommendations, COPA recommends that the Department clearly address limitations under the Fourth Amendment that relate to the justifications for conducting invasive searches, the appropriate surroundings for conducting such searches, the availability of appropriately gendered members to conduct the searches, and the necessity of advance approvals. In addition to violating personal privacy and dignity, unlawful invasive searches present liability concerns and significantly undermine Department efforts to build public trust.

Opportunities to Incorporate Body-Worn Camera Equipment in Training

To better acclimate new members, as well as reinforce device usage expectations that are compliant with applicable regulations, the Department’s hands-on training modules, such as use-of-force training, should incorporate either actual or imitation Body-Worn Camera (BWC) equipment. Recurring qualification requirements for existing members, such as firearms and weapons qualification programs, also present opportunities to reinforce device usage expectations. Compliance with BWC regulations is a critical component of the Department’s efforts to build public trust through transparency, so training objectives should emphasize that a functioning and active BWC is as crucial to public safety as a member’s firearm, and that law enforcement activities necessarily require both.

After Action Review Expectations

COPA is pleased to see the incorporation of specific provisions in Department directives mandating that supervisory staff conduct After Action Reviews (AARs) at the close of certain critical events, such as search warrant service (*see* revised draft of Special Order S04-19 – Search Warrants issued March 3, 2021). To maximize the benefits of this process and keep it from



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becoming pro forma, COPA recommends that Department training programs clearly convey expectations for AARs and how the Department intends to leverage feedback from these reviews to enhance its future operations.

Thank you for the opportunity to create a dialogue regarding these important topics. We look forward to further conversations as we continue to work towards the shared goal of improving training outcomes for the Department. Should you have any questions, or require any additional information, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink that reads "Sydney R. Roberts".

Sydney R. Roberts
Chief Administrator

cc: Robert Boik, Executive Director, Chicago Police Department
Maurice Classen, Chief of Staff, Office of the Mayor
Angie Weis, Senior Advisor for Public Safety, Office of the Mayor
Kevin Connor, General Counsel, COPA
Andrea Kersten, Chief of Investigative Operations, COPA
Jay Westensee, Deputy Chief Administrator, COPA