City of Chicago RACIAL EQUITY ACTION PLAN
Civilian Office of Police Accountability (COPA)

Under the City of Chicago's Municipal Code (Ch. 2-4-100), all City of Chicago departments must create and maintain Racial Equity Action Plans (REAPs) "to articulate and guide strategy aimed at advancing equity and making it a permanent pillar in all departmental workstreams." Progress on all REAPs are accounted for annually as a part of the City of Chicago's budget process. This document outlines the components of the REAP and ensures that all strategies are aligned to Chicago's citywide vision: ***All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025)***

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THE CITY OF CHICAGO'S DEFINITION OF EQUITY

Equity is both an outcome and a process:

As an **outcome** equity results in fair and just access to opportunity and resources that provide everyone the ability to thrive. Acknowledging the present and historical inequality that persist in our society, equity is a future state we strive to create where identity and social status no longer predestine life outcomes.

As a **process**, equity requires a new way of doing business. One that:

(1) Prioritizes access and opportunities for groups who have the greatest need.

(2) Methodically evaluates benefits and burdens produced by seemingly neutral systems and practices.

(3) Engages those most impacted by the problems we seek to address as experts in their own experiences, strategists in co-creating solutions, and evaluators of success.

Further, our focus is on evaluating our own strategies, interventions and resources in a way that prioritizes those who are most negatively impacted by current policies, procedures & practices.

Racial equity focuses on the social construction of race and how it has been used (historically and presently) to unjustly distribute opportunity and resources based on a person's skin color, heritage, ethnicity, and/or national origin. Advancing racial equity requires an analysis of systemic racism inclusive of the ways harm is created at the individual, interpersonal, institutional, and structural levels. It also requires a commitment to dismantling systems that perpetuate racialized outcomes and rebuild systems that produce systemic inclusion.

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The coordination of the development and implementation of City of Chicago REAPs is led by the Office of Equity and Racial Justice. For more information about REAPs and/or the work of the office visit www.chicago.gov/equity.

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RACIAL EQUITY ACTION PLAN: Priority #1

The City of Chicago's Vision: All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025)

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Citywide Priority Area & Desired Result:

PUBLIC SAFETY: All Chicagoans are safe across the city and have trusting relationships with law enforcement and first responders.

Indicators Examined:

Community Data
Safety Gap, Life Expectancy Gap, Violent Crimes, COPA Complaints Rates/Maps, and Chicago Health Atlas.

Program/Department Data
Complaints, Stops, Closed No Findings (esp. due to lack of cooperation). CPD generated reports (esp. those not triggered by orders), and Clearance Rates.

Community Feedback and Narratives

Certain communities face structural barriers that prevent residents from filing complaints with COPA. Additionally, certain communities are unaware of COPA, have misconceptions about what COPA is able to achieve, and/or are unhappy with the outcomes. Programs, policies, initiatives, and service participation rely on knowledge of COPA (e.g., independence, existence, etc.), technology access, language comprehension (formal and institutional knowledge, etc.), trust, and accessibility.

Define the Problem

Black and Brown young adults from the South and West sides of Chicago are least served by, most disenfranchised by, and have the least trust in Chicago's Public Safety Infrastructure. This inadequate service and lack of trust leads to lower life expectancy and negative health outcomes. Black men aged 20-39 in these same neighborhoods regularly report experiencing disproportionate civil rights violations and excessive force at the hands of the police department. The DOJ (2017) and ACLU (2013) reports both highlight disproportionate stops and police-interactions with this same cohort of black men. A robust justice and oversight framework would hold this infrastructure to account, help to build trust within these communities, and provide voice and agency to those most negatively impacted by the deficiencies in the system. Despite this infrastructure underserving this community, Chicago's public safety oversight is confusing, slow, and narrowly focused on a punitive system designed to address and discipline misconduct of individual members. This does not yield the systemic change in culture that people want.

Identify Root Causes to the Problem

Interpersonal: Offensive personal interactions, over-criminalization, civil rights violations, and over policing.

Institutional: There is a culture in CPD that emphasizes and rewards members based upon numbers of guns, arrests, and stops. Unfortunately, this narrow criteria for assessment does not yield Public Safety or trust. Issues of culture are not well addressed by the existing accountability systems.

Structural: Gentrification, mass-incarceration, low investments in education, housing, and development, redlining, unemployment

Societal: Culture is rooted in racism, white supremacy, classism, and sexism.

Define Your Department's Opportunity

COPA's official, objective, and evidentiary investigations present an opportunity to consider the broader context in which police misconduct happens, including structural and systemic issues that exist outside of any one event, complainant, or officer. By exploring these issues throughout its investigations, COPA could begin to document, understand, and propose solutions to problems that undermine the safety of all Chicagoans.

RACIAL EQUITY ACTION PLAN: Priority #1

Our department will advance the following strategies:

1. Department Strategy: Commit to the REAP and meaningfully engage with its contents.

Measures of Impact: Continued reporting by REAP team on progress of COPA in reaching full-compliance

Actions	Implementation Plan	Timeline	Status
1.1. Maintain a representative team of COPA staff and support all members of the REAP team to facilitate agency compliance and reporting on REAP.	Understanding that REAP compliance will be the responsibility of agency leadership, the writers of the REAP recognize the potential need for clarification and transparency around the contents of the REAP. To this end, COPA shall maintain a REAP team, initially comprised of the members who drafted this REAP, and which should always have at least ten members. The REAP team shall contain no less than one member of each represented bargaining unit at COPA, and at least one member each from legal, training, investigations, PRAD, IT, admin, and community outreach, representing multiple levels within the agency. Without any of these three requirements, the team shall not have a quorum for any meeting or function. The team should look like the City of Chicago, with representative diversity of race, gender, LGBTQ+ identity, etc. Members of the REAP team shall have a stated commitment to diversity, equity, and inclusion at COPA. This team shall meet quarterly and will be tasked with aiding agency leadership in REAP implementation and reporting on REAP compliance. The REAP Team's scope shall cover all three Priority Areas included in this REAP. As the REAP reaches compliance in years two and three, the REAP team will transition into a broader Diversity, Equity, and Inclusion committee. The timing of this transition will be gradual and happen over the course of the three-year REAP. Hereafter, this team may be referred to as the REAP/DEI committee.	Immediate	

1.2 Reporting on REAP compliance shall be done collaboratively with the REAP Team, and all REAP reporting shall be shared publicly.	The members of the REAP team will be responsible for reporting on REAP compliance. These reports shall be approved by consensus within the REAP team by whatever mechanism deemed appropriate by the members of the team. City Council and other oversight agencies should expect REAP reporting to carry the endorsement or approval of this REAP team. This team will work collaboratively with the COPA Senior Performance Analyst to ensure all REAP goals are met. Agency leadership may respond to, but may not override, the statements of the REAP team regarding REAP compliance. All REAP Team reporting shall be shared publicly on the COPA website. Senior leadership shall consult with the REAP Team prior to budget submission and hearing to work collaboratively on ensuring REAP priorities are met in the budget submission.	Yr 1-3	

RACIAL EQUITY ACTION PLAN: Priority #1

2. Department Strategy: Develop new ways to document, analyze, and communicate about structural and systemic issues undermining public safety.

Measures of Impact: Increased trust as measured by COPA surveys of complainants and the community, greater community participation in investigations

Actions	Implementation Plan	Timeline	Status
2.1 Broaden the investigative lens to incorporate both the context of member(s) action(s), as well as the broader public safety infrastructure of the City of Chicago.	Draft investigative strategies to consider the broader context that members were operating in during the complained conduct including trainings, recent in-services, orders, bulletins, roll-call orders, recent events, and informal cultural exchanges. For complainants, develop investigative strategies that consider the broader context of public services, this can include other city agency touch-points, calls for service, and broader issues of insecurity as addressed by existing community needs assessments.	Yr 1	
2.2 Study and analyze the results of the above investigative process.	In collaboration with community partners, develop useful analytics and data products regarding the broader framework and context of misconduct, while also recognizing the broader needs of the community.	Yr 2	
2.3 Collaborate with partner agencies to find ways to reduce barriers to public safety, contextualized by these data.	COPA will regularly report these studies of complainant and member environmental context, while working with partner agencies, and drafting relevant legislative fixes to reduce barriers to safety. These reports shall be shared publicly.	Yr 3	

RACIAL EQUITY ACTION PLAN: Priority #1

3. Department Strategy: Ensure investigations strengthen the police accountability infrastructure to improve public trust.

Measures of Impact: Increased trust as measured by COPA surveys of complainants and the community. Decreased time between complaint and concluded investigation, and between investigative conclusion and the enacting of penalty/final disposition.

Actions	Implementation Plan	Timeline	Status
3.1 Improve investigative processes to expedite cases.	Hire a COPA Senior Performance Analyst to identify opportunities for improving the investigative process.	Yr 1	
3.2 Improve communications with complainants and accused to improve procedural justice.	Case liaisons will actively reach out to complainants to provide regular investigative updates. COPA will collaborate with FOP and PBPA to ensure accused and involved members are apprised to the status of investigations. COPA will also work with FOP/PBPA to develop and provide trainings to members to prepare them for the process of providing statement(s) to COPA.	Yr 1-2	
3.3 Work with City Departments to identify opportunities for expediting post-closure processes.	At present, the grievance and Department of Law review of COPA cases takes nearly as long as the full investigative process. COPA will work with the Department of Law to reduce this backlog and implement processes to ensure that penalties and suspensions are served promptly, and will work to increase communications and transparency with both accused and complainant.	Yr 1-3	

RACIAL EQUITY ACTION PLAN: Priority #1

4. Department Strategy: Better understand participants' expectations when they make a complaint and throughout the investigative process, thereby creating opportunities for restorative and collaborative resolutions.

Measures of Impact: Increased trust as measured by COPA surveys of complainants and the community. Implementation of diverse, broad programs for procedural and restorative outcomes.

Actions	Implementation Plan	Timeline	Status
4.1 Study the diverse perspectives on complainant and member collaborative and restorative outcomes, with community input.	Collaborate with civilian and sworn community and utilize COPA complainant survey pilot-program to determine the best ways to add additional restorative and collaborative programs into the investigative process.	Yr 1	
4.2 Identify the other pathways to procedural justice and other forms of restorative or collaborative outcomes sought by community, complainants, and members.	With community groups and members of the public, collaboratively draft a policy and training that expands COPA's investigative processes to allow for diverse paths to collaborative or restorative outcomes, and ensure that this meets the needs of constituents and increases buy-in from community.	Yr 2	
4.3 Operationalize an investigative process that incorporates studied paths to restorative and collaborative outcomes, with community contributions.	Implement and train the necessary changes in the investigative processes that are responsive and include the perspectives found in the above data and survey collection process, while also allowing for the voice of individual complainants and members during each investigation, and giving them paths to restorative and collaborative resolutions.	Yr 3	

RACIAL EQUITY ACTION PLAN: Priority #2

The City of Chicago's Vision: All people and all communities have power, are free from oppression, and are strengthened by equitable access to resources, environments, and opportunities that promote optimal health and well-being. (HC2025)

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Citywide Priority Area & Desired Result:

COMMUNITY ENGAGEMENT: All Chicagoans have a meaningful opportunity to influence City of Chicago programs, policies, and initiatives.

Indicators Examined:

Community Data

Data about where COPA complaints originate, and with what communities, as stratified by geography, culture, language, and other dimensions of identity.

Program/Department Data

A comparison of COPA complaints and police interactions to find folks who are underrepresented within COPA's complaints. Anecdotally, The REAP/DEI committee has heard of a lack of awareness by many in the general public of COPA's role in public safety. Many may have heard of COPA through the news but lack the understanding of our agency mandate and role in oversight.

Community Feedback and Narratives

The REAP/DEI committee have heard that it is hard to find communities who know that COPA exists unless they are very involved in and well served by the City. Additionally, members of the community who know that COPA exists are not fully familiar with how COPA fits within the City's larger accountability framework and what specifically COPA does.

Define the Problem

Certain communities face structural barriers which prevent them from filing complaints with COPA. Additionally, certain communities are unaware of COPA, have misconceptions about what COPA is able to achieve, and/or are unhappy with the outcomes. Programs, policies, initiatives and service participation rely on knowledge of COPA (i.e., independence, existence, etc.), technology access, language comprehension (formal and institutional knowledge, etc.), trust, and accessibility.

Identify Root Causes to the Problem

Those that do know that COPA exists find it challenging to engage with the agency.

Define Your Department's Opportunity

Actively engage community members in a variety of ways to raise awareness of the agency and its function. Engage involved community members in a meaningful way to ensure a cross section of residents are able to influence COPA's policies, programs, and initiatives.

RACIAL EQUITY ACTION PLAN: Priority #2

Our department will advance the following strategies:

1. Department Strategy: Create a strategic operations plan to expand COPA's visibility and deepen relationships with community partners to expand our network.

Measures of Impact: Number of community partnerships established; Number of new community areas engaged; Engagement of District Councils / CPD via planned community events.

Actions	Implementation Plan	Timeline	Status
1.1 Referral list.	To update referral list based on feedback received from community organizations and members of the public. Provide this updated list of referrals to COPA staff.	6 months	
1.2 Engage community based organizations and residents at large to determine how to better serve them.	Community Survey at community engagement events available in diverse languages.	1 year	
1.3 Participate in District Council and Community Policing Events.	Partner with District Council and Community Policing offices to participate in events, especially in the summer. Provide COPA staff information about District Council events in their community area.	1 year	

RACIAL EQUITY ACTION PLAN: Priority #2

2. Department Strategy: Expand efforts to educate the public to increase awareness of COPA and the role we play in public safety and police oversight.

Measures of Impact: Number of people who subscribe to COPA's public newsletter; Number of Chicagoans who complete COPA People's Academy twice yearly; and the number of youth trained as Youth Ambassadors.

Actions	Implementation Plan	Timeline	Status
2.1 Youth Ambassadors.	Engage Career Centers at local colleges and universities; Partner with CPS Career and Technical Education on public safety at local high schools.	2 years	
2.2 People's Academy Participants.	Provide COPA People's Academy participants with the tools necessary to be able to explain to the public COPA's function and how to submit a complaint or compliment an officer.	1 year	
2.3 Virtual Outreach Efforts.	Newsletter published by COPA on police oversight on a regular basis to include community engagement efforts.	6 months	

RACIAL EQUITY ACTION PLAN: Priority #2

3. Department Strategy: Make our public-facing material more accessible for people of various community areas, languages and abilities.

Measures of Impact: Number of materials of languages other than English being given to community members. Number of Chicagoans reached using assistive technologies

Actions	Implementation Plan	Timeline	Status
3.1 Function to translate website into multiple languages and readable for the seeing-impaired. Make our public safety data more accessible and responsive to community needs and backgrounds.	Research with IT the functionality needed to translate the website.	1 year	
3.2 Provide COPA staff with the opportunity to learn about engaging with the community. Identify and remove barriers to participate in community engagement events.	Create a staff training module on engaging community at events; Provide staff with available events they can join the community engagement team weekly via the newsletter.	1 year	
3.3 Coordinate with the Mayor's Office for People with Disabilities to ensure COPA complainants have full access via assistive technologies	Tablet; Reader view on website.	1 year	

RACIAL EQUITY ACTION PLAN: Priority #3

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Citywide Priority Area & Desired Result:

WORKFORCE: The City of Chicago's workforce reflects the demographics of the City, and all employees are connected to training and advancement opportunities.

Indicators Examined:

Community Data

COPA workforce demographics disaggregated by race, gender, age, etc.; Management demographics; Salary.

Program/Department Data

Promotion and retention rates; training data

Community Feedback and Narratives

Given that this priority area is focused on staff at the agency we anticipate gathering feedback and narratives as we execute our strategies.

Define the Problem

Based on our limited knowledge about agency demographics, it appears COPA staff is not representative of Chicagoans who are most impacted by police misconduct. Among the few demographics reported of COPA workforce, we see specific races underrepresented (e.g. Indigenous, Native American, AAPI, and LatinX). Demographic disparities are more apparent among leadership and senior leadership. We perceive potential disparities but lack data and/or reporting regarding languages spoken, national origin, age, ability, LGBTQIA+, transportation access, education, religion, neighborhood, immigration status, and incarceration status. In addition, the agency does not communicate well about career trajectories and paths for internal promotions, which creates a perception that internal promotions are lacking or do not exist. There are entry-level barriers that make it challenging for potential candidates to receive an interview and be considered for a position. Additionally, the entry-level requirements for most positions do not allow for a path for interns to gain employment at the agency.

Identify Root Causes to the Problem

COPA lacks a culture of consistent communication, membership engagement, and development thereby fostering a perception that opportunities do not exist for all employees and that many employees do not feel seen or heard, especially employees in underrepresented demographics. Lack of communication about expectations and success for employees also causes employees to feel a lack of job security.

Define Your Department's Opportunity

COPA is served by a diverse and knowledgeable workforce with broad expertise. The agency will foster a culture of constructive communication, growth, and dissent by creating additional opportunities to amplify employee voices related to internal operations and pathways for growth to mid-level and senior leadership. This requires a healthy, collegial culture with shared values, which fosters an inclusive environment supportive of employees in all demographics. Finally, in collaboration with the Department of Human Resources (DHR), there is a need for specific data regarding who is and is not well-served by our workforce recruitment efforts in order to promote a diverse, equitable, and inclusive staff reflective of Chicago demographics and the communities we serve.

RACIAL EQUITY ACTION PLAN: Priority #3

Our department will advance the following strategies:

1. Foster a workforce culture that is supportive of COPA's diverse staff and promotes wellness, inclusion, and career development at all levels.

Measures of Impact: Looking for problems (e.g. disparities and underrepresentation) in volunteerism (i.e. involvement) - in COPA committees, perception surveys, NAMI surveys, feedback in staff-driven focus groups, presenting information at all-staff meetings, increases in skillsets and knowledge

Actions	Implementation Plan	Timeline	Status
1.1 Develop, define, and implement a set of principles that compliment and amplify the agency's core values (Independence, Timeliness, Integrity, and Transparency) and directly address equity.	Establish staff-led focus group to develop a set of principles that compliment COPA's core values. The REAP/DEI committee will recommend principles based on the data collected from the focus groups to senior leadership. The REAP/DEI committee and senior leadership will select, develop and define at least four principles from staff recommendations.	Yr 1	
1.2 New DEI Coordinator and integration of DEI-related job responsibilities into already existing positions to support the implementation of DEI goals/principles.	With the assistance of the Mayor's Office for Equity and Racial Justice, evaluate the need for, and develop new positions such as a Diversity, Equity & Inclusion (DEI) Coordinator. COPA will seek approval of the Budget Office for the position(s) deemed necessary. Also, communicate demographic needs to DHR. The REAP/DEI committee will assist the new coordinator with monitoring growth and developing diversity programs. Implement channels for staff to collaborate with leadership on policies and actions to ensure that they align with core values and principles.	Yr 2	
1.3 Establish annual calendar of consistent trainings that address racial equity and inclusion as well as reflect the agency's core principles and require agency wide participation, i.e. senior leadership, supervising staff, etc.	Develop a targeted curriculum and comprehensive annual plan of in-person, interactive workshops that address racial equity, cultural humility, and diversity. Communicate to all staff how past identified inequities will be addressed and not continue.	Yr 2	

RACIAL EQUITY ACTION PLAN: Priority #3

2. Develop recruitment, hiring, and promotional strategies to attract and cultivate diverse candidates who are representative of City demographics at all levels of the agency and align with COPA's core values.

Measures of Impact: Revised job descriptions and interview questions that speak to core values, diversity in the applicant pool, COPA interview pool, and hired staff

Actions	Implementation Plan	Timeline	Status
2.1 Revise, simplify, and standardize job descriptions and minimum qualifications to remove potential barriers to attracting a diverse life, education, and professional experiences. Include multiple ways to apply for a position.	In collaboration with administrative leadership, create staff committees or focus groups to discuss actual job functions compared to existing job descriptions, and identify areas for change. Collaborate with Senior Leadership to implement processes to address these areas.	Yr 1	
2.2 Incorporate the COPA core values and principles into the hiring process.	Incorporate the COPA core values and principles to our job postings and descriptions. Develop, with consultation of Department of Human Resources, methods for incorporating questions related to COPA's core values and principles into the interview process.	Yr 2	
2.3 Collect and review data to ensure COPA has a more equitable hiring process	Review data on applicant pools, including internal candidates, to review who applies, who proceeds to an interview at COPA, and who is offered and accepts jobs. Also, review demographic information on those resigning or leaving the agency. Analyze that data to determine where in the process barriers to creating a more equitable workforce exist. Continue to modify the hiring process to address these barriers.	Yr 1	

RACIAL EQUITY ACTION PLAN: Priority #3

3. Create equitable and transparent opportunities for professional development and growth in each unit/department.

Measures of Impact: Internal applicants, internal interviews, internal promotions/hires, outcomes of staff evaluations

Actions	Implementation Plan	Timeline	Status
3.1 Develop consistent and equitable opportunities for staff participation in activities that promote and reflect agency goals and foster professional development	Continue to develop staff led committees and opportunities to participate in events, actions, trainings, and meetings that promote professional development and reflect agency goals. Offer training opportunities for each unit/department that are based on job functions and expectations.	Yr 1	
3.2 Develop a system of tracking and acknowledgement/recognition for staff participation that is made visible in all staff communication (e.g., weekly announcements and/or agency newsletters) as well as supervisor led team meetings	Create a tracking system of staff accomplishments maintained by the new DEI Coordinator (with relevant units or departments), who guarantees and facilitates the acknowledgment of staff highlights that is distributed agency wide, and is consistently recognize staff ac by supervising staff at team meetings.	Yr 2	
3.3 Implement a comprehensive system of documenting individual staff accomplishments during the formal evaluation process to facilitate and memorialize professional development	Administrative leadership should collaboratively create a better system of formal, transparent, and consistent evaluation in line with the core principles defined in 1.1. Implement a review process which includes subjective measures of output and departmental goals, trains supervisors on how to conduct evaluations, and allows for employees to respond to and contribute to those evaluations. Create ways for the evaluation system to identify candidates for advancement and develop ways to better train employees. Create systems for staff to evaluate their supervisors. Encourage supervisors to mentor staff to foster professional development and building to career goals.	Yr 2	