

School Resource Officer (SRO) Community Working Group Recommendations – Summary of Response Categories

Total	Accepted or Accepted with Modifications	Policy will be consistent with Approved Intergovernmental Agreement	Not related to CPD SRO Policy	CPS-Related Concern	Not Accepted
54	16	11	19	5	3

CPD RESPONSE TO SRO WORKING GROUP RECOMMENDATIONS: Accepted / Accepted with Modifications

Working Group Recommendations:	16	CPD Response
<p>Recommendation Q20:</p> <p>CPD officers (SRO's and non-SRO's) should not handcuff or use other physical restraints on a student in a school. CPD officers (SRO's and non-SRO's) should deescalate situations in schools without the use of restraints.</p>		<p>CPD will include current CPD policy into the SRO policy to accommodate the request that Department members deescalate situations, when safe and feasible to do so, and that Department members ensure any use of force or use of restraints are reasonable and necessary.</p> <p>"During any investigations at a Chicago Public School, Department members will:</p> <ul style="list-style-type: none"> only use force that is objectively reasonable, necessary, and proportional based on the totality of the circumstances, consistent with the Department directive titled "Use of Force." use de-escalation techniques to prevent or reduce the need for force when it is safe and feasible to do so based on the totality of the circumstances. This includes continually assessing the situation and modifying the use of force as circumstances change and in ways that are consistent with officer safety, including stopping the use of force when it is no longer necessary." <p>"Members are reminded that in accordance with Department directive S06-04 Processing of Juveniles and Minors Under Department Control, when determining the appropriateness of applying handcuffs or other physical restraints to a juvenile, Department members will:</p> <ul style="list-style-type: none"> consider the totality of the circumstances, including, but not limited to, the nature of the incident and the juvenile's age, physical size, actions, and conduct, when known or objectively apparent to the member, and whether such restraints are necessary to provide for the safety of the juvenile, the Department member, or others."
<p>Recommendation Q21:</p> <p>If arresting or detaining a student in school, a CPD officer (SRO's and non-SRO's) should do so in a way that minimizes visibility to the school community. For example, do not walk them out during a passing period, do not linger in an outdoor area visible from school building windows, etc.</p>		<p>CPD will include language to ensure SROs are mindful of the perception of an arrest or detention of a student in school and that they minimize visibility of these actions, when it is safe and feasible to do so.</p>

<p>Recommendation Q22:</p> <p>If a school discipline investigation and a police investigation are taking place for the same incident, the investigations should be kept separate (e.g., interview involved students separately). School administration should not share interview content or records (like written statements by the accused student or witnesses collected by a Dean) with CPD, nor vice versa.</p>	<p>CPD will include language to ensure SROs are not involved in CPS disciplinary investigations and are mindful of the separation of the two investigations. Additionally, the SRO policy will reflect the current IGA language about records access.</p>
<p>Recommendation Q23:</p> <p>CPD (SRO's and non-SRO's) should not interview students in a school building during school hours. CPD investigations and interviews should take place in police stations, and whenever possible should not take place during school hours.</p>	<p>CPD will include language to ensure SROs, when safe and feasible to do so, conduct post-arrest investigations and interviews at a Department facility and not at the school.</p>
<p>Recommendation Q24:</p> <p>CPS and CPD should both be complying with all the requirements of 105 ILCS 5/22-85, which requires not only parent notification before an interview, but waiting for a parent to arrive if they want to attend a questioning, and if the parent isn't able to be present having a school social worker, counselor, or psychologist present. CPD policy should be revised to reflect all the requirements of 105 ILCS 5/22-85.</p>	<p>CPD will review 105 ILCS 5/22-85 to ensure the language of the SRO policy (listed below) reflects all the requirements of the statute and requires SROs to comply with the provisions of the statute.</p> <p>S04-01-02: VII. Investigation Responsibilities, Items B-6 through 8:</p> <ol style="list-style-type: none"> 6. postpone the interview of the named student temporarily pending a prompt response by the parent or guardian to the school, when appropriate. 7. when a parent or guardian is not available, request that the principal make a reasonable effort to ensure that a school social worker, school nurse, school guidance counselor or other mental health professional is present during the interview process. 8. permit the school principal or designee to be present in the room in the school during the interview of the student whenever the parent or guardian cannot be notified, are unavailable to promptly respond to the school, or are potentially the subject of the criminal investigation.
<p>Recommendation Q27:</p> <p>CPD (SRO's and non-SRO's) should not use restraints or force in schools outside of imminent and life-threatening events. If CPD must use force, they must first employ de-escalation tactics, use the least amount of force necessary, and without physical restraints or weapons.</p>	<p>CPD will include current CPD policy into the SRO policy to accommodate the request that Department members deescalate situations, when safe and feasible to do so, and that Department members ensure any use of force or use of restraints are reasonable and necessary.</p>

<p>Recommendation Q29:</p> <p>SRO’s should not wear standard full police uniform. However, they should wear clothing that clearly identifies them as “Police” (not “SRO” or “School Resource Officer”) and wear their badges visible at all times.</p>	<p>CPD will include current CPD policy into the SRO policy that requires the display of the SRO's name and star on their uniform. CPD will also comply with the approved IGA, which requires that SROs will wear the standard field uniform.</p>
<p>Recommendation Q31:</p> <p>CPD and CPS should be trained on the confidentiality protections in the Illinois Mental Health and Developmental Disabilities Confidentiality Act (IMHDDCA), the Family Educational Rights and Privacy Act (FERPA), and the Illinois School Student Records Act (ISSRA).</p>	<p>CPD will include the confidentiality protections provided in the law in SRO Training.</p>
<p>Recommendation Q39:</p> <p>All complaints are reviewed by COPA and the school’s LSC.</p>	<p>Consistent with current policy and City ordinance, the SRO policy will reflect that COPA will receive and record all complaints and allegations of misconduct against a Chicago Police Officer. Additionally, the SRO policy will comply with the approved IGA (Section 11 Complaint Process: Investigations).</p>
<p>Recommendation Q41:</p> <p>Complaints get recorded on the officer’s conduct record.</p>	<p>CPD will include language in the SRO policy concerning an SRO's disciplinary record/history consistent with existing Department policy and the Department member's collective bargaining agreement.</p>
<p>Recommendation Q45:</p> <p>If fired, SRO cannot serve in another school.</p>	<p>CPD will include language in the SRO policy that prohibits a CPD member from serving as an SRO when the member no longer meets the eligibility requirements of an SRO, including the requirements that pertain to the SRO's disciplinary history.</p>
<p>Recommendation Q49:</p> <p>To the extent that CPD officers are granted access to student data or records, they should maintain strict confidentiality and security in handling that information. They should only retain that information for the limited time that they need to respond to the health and safety emergency, and then destroy any records or documents containing that information.</p> <p>Example: An officer who is informed that a student has asthma should not be writing down notes on paper, and leaving it around where others might find it.</p>	<p>CPD will include the information confidentiality and security protections in the SRO policy.</p>

<p>Recommendation Q50:</p> <p>CPD officers should not take student data or information that they learn about students and share it into outside or permanent police databases, such as the gang database. CPD officers should not be monitoring or sharing information about immigration status of students or families. Any temporary records that SROs might maintain regarding students should be regularly erased or destroyed.</p>	<p>CPD will include in the SRO policy CPD's current policies on the data access and reporting, including the requirements for accessing Department data and any legal requirements that juvenile data be filed and retained separately.</p>
<p>Recommendation Q54:</p> <p>The City should maintain this data separately from other police databases and should not allow it to be accessed by individual officers or used for purposes other than aggregate data-sharing.</p>	<p>CPD will include current CPD policies on the data access and reporting in the SRO policy, including the requirements for accessing Department data and any legal requirements that juvenile data be filed and retained separately.</p>
<p>Recommendation Q52:</p> <p>Officers should not be interviewing students on school grounds, or contacting parents/guardians of students in relation to incidents at school. Whenever officers are called to school, the school must notify the student's parents/guardians and make sure that parents/guardians or an attorney are present before officers detain or question a student on school grounds. Interpreters or translations must be provided for parents and students to ensure language access. This should apply even for students 18 and over while on school grounds. (Note: State law, 105 ILCS 5/22-85, requires attempted notification and reasonable efforts at making sure parents/guardians are present for students under 18; we think CPD's policy should be even more protective of students than the minimum requirements of the law.)</p>	<p>CPD will review 105 ILCS 5/22-85 and ensure the language of the SRO policy reflects all the requirements of the statute and requires Department members to comply with the provisions of the statute.</p> <p>Additionally, CPD will ensure the SRO policy complies with current CPD requirements and procedures for interpreter services (S02-01-01 "People with Disabilities" and S02-01-05 "Limited English Proficiency").</p>

Recommendation Q53:

CPD should collect, and publish each year (in a report issued by the last Monday of May so LSC members can access before the last meeting), the following data on its activity relating to CPS schools:
Numbers of:

- Arrests on/near school property
- Arrests of students at schools
- Calls for service at schools
- Police investigations at schools
- Occasions when students were detained or questioned by police at school, or transported to station from school for detention or questioning
- Incidents of use of force (incl. Taser or baton use) at school
- Complaints about police/SRO conduct at school
- Lawsuits pertaining to police/SRO conduct at school
- Occasions when student data or records were shared with law enforcement, and the reasons for doing so.

The data should be categorized (as much as possible without being individually identifiable) by:

- Type of incident (such as drugs, weapons, etc.)
- Race
- Gender
- IEP/disability
- English learner status
- Name of school
- Name of officer

CPD will review the current SRO policy on reporting Department Activity in CPS building or grounds to ensure the appropriate data is collected and retained, consistent with CPD's legal obligations and limitations (e.g., the Illinois Mental Health and Developmental Disabilities Confidentiality Act (IMHDDCA), the Family Educational Rights and Privacy Act (FERPA), and the Illinois School Student Records Act (ISSRA)). CPD will also continue to review and determine the appropriate mechanism to publish such data.

School Resource Officer (SRO) Working Group Recommendations Intergovernmental Agreement Responses

The Department would like to preface that the below list of responses to the working groups recommendations will be placed into policy utilizing the signed Intergovernmental Agreement (IGA) language between the City of Chicago and the Board of Education of the City of Chicago.

SRO Working Group Recommendations:	11	Department Response
<p>Recommendation Q25: CPD (SROs and non-SROs) should not be involved in any school actions unless the event is an imminent and life-threatening event.</p>		<p>This recommendation conflicts with CPD's requirements as outlined in the IGA.</p> <p>CPD will ensure compliance with Exhibit A-1, Scope of Services, that requires CPD to provide to the Board the Services set forth below:</p> <ul style="list-style-type: none"> B. SROs will maintain a visible presence in and around the Designated Schools and have positive student interactions. C. SRO shall respond immediately to calls involving emergency situations. SROs will call in to dispatch all emergency situations to protect all CPS students, school personnel, or others who are present on school property and, in non-criminal acts, reference the CPS Student Code of Conduct to determine, in consultation with school administrators, including for matters within its purview, the Office of Student Protections and Title IX, if the situation can be handled through Board student disciplinary processes. E. SROs will coordinate with school administration and the CPS Office of School Safety and Security personnel in problem solving exercises and emergency drills. SROs will participate in any training of CPS emergency drills, including active shooter response. SROs' actions shall always minimize any disruption to the school's normal operations. I. SROs shall be a resource for students which will enable them to be associated with a law enforcement figure and role model in the students' environment. J. SROs can participate in meetings with school administration upon notification and approval of the SROs immediate supervisor or Commander.

Recommendation Q26:

CPD (SROs and non-SROs) should not be patrolling schools, including patrolling the hallways, classrooms, cafeteria, bathrooms, or student common areas, looking for things to get involved in.

This recommendation conflicts with CPD's requirements as outlined in the IGA.

CPD will ensure compliance with the School Resource Officer Job Description under ATTACHMENT 1 that requires that School Resource Officers Shall:

- A. Establish and maintain a close partnership with school administrators in order to provide for a safe school environment. Assist school officials with their efforts to enforce Board policies and procedures. Ensure school administrator safety by being present during school searches, which may involve weapons, controlled dangerous substances or in such cases that the student's emotional state may present a risk to the administrator. Assist school administrators in emergency crisis planning and implementation, and building security matters. Provide a course of training for school personnel in handling crisis situations, which may arise at the school.
- B. Work to provide and maintain a safe school environment through close contact and positive relationships with students. The SRO should monitor crime statistics and work with local patrol officers and students together to design crime prevention strategies.
- C. Provide law enforcement and police services to the school, school grounds and areas adjacent to the school; investigate allegations of criminal incidents per police department policies and procedures; and enforce state and local laws and ordinances.
- D. Be visible within the school community; attend and participate in school functions; build working relationships with the school's staff as well as with student and parent groups.
- E. Develop and implement classes, lectures or programs in law related education to support the educational efforts of the faculty; work closely with teachers in designing and presenting law-related topics and the role of police in our society.
- F. Work with guidance counselors and other student support staff to assist students and to provide services to students involved in situations where referrals to service agencies are necessary; assist in conflict resolution

	<p>efforts.</p> <p>G. Initiate interaction with students in the classroom and general areas of the school building; promote the profession of police officer and be a positive role model; increase the visibility and accessibility of police to the school community.</p>
<p>Recommendation Q28:</p> <p>CPD (SROs and non-SROs) should not park CPD vehicles outside of school buildings in very visible locations, like in front of the building.</p>	<p>This recommendation conflicts with CPD's requirements as outlined in the IGA.</p> <p>CPD will ensure compliance with Exhibit A-1, Scope of Services, where CPD agrees to provide to the Board the Services set forth below:</p> <p>SROs will maintain a visible presence in and around the Designated Schools and have positive student interactions.</p>
<p>Recommendation Q32:</p> <p>Education records (paper copies and access to records in online databases): CPD (SROs and non-SROs) should not obtain or seek to obtain education records or access to education records. CPS should not share education records/documents with CPD unless the disclosure is both legally permissible under ISSRA, IMHDDCA, and FERPA; and legally mandated by court order or subpoena.</p>	<p>This recommendation significantly aligns with CPD's requirements for access to records and data as outlined in the IGA.</p> <p>CPD will ensure compliance with Section 15 – Access to Education Records that requires:</p> <p>A. School administrators shall allow SROs to inspect and copy any public records maintained by the school to the extent allowed by state and federal student privacy laws, including ISSRA and FERPA, and CPS policies and guidelines.</p> <p>B. In connection with an emergency, school administrators shall disclose to the SRO that information in a student's record that is necessary to protect the health or safety of the student or other persons, subject to FERPA and the regulations of the U.S. Department of Education, and based on the seriousness of the threat to someone's health or safety, the need of the information to meet the emergency situation, and the extent to which time is of the essence.</p> <p>C. If confidential student record information is needed by an SRO, but no emergency situation exists, the information may be released only as allowed by ISSRA, FERPA or other law.</p> <p>D. SROs are subject to CPO General Order G10-01-03 and will operate in compliance with that General Order at all times. SROs are prohibited from entering any information into the Criminal Enterprise Information System (CEIS).</p>

	<p>E. SROs shall comply with City of Chicago Municipal Ordinance 2-173, which made the City of Chicago a Welcoming City. No SRO shall unlawfully discriminate against students or student family members based on their immigration status as prohibited by Board Resolution 16-1216-RSS and the Board's Comprehensive Non-discrimination Policy (19-0522-P01) as either may be hereafter amended from time to time.</p>
<p>Recommendation Q34: Selection criteria of SROs should include a stellar record. Stellar record being defined by the following: Officers must have at least 5 years' experience with CPD. Officers must have zero complaints within 5 consecutive years. Officers should have a minimum average quarterly rating of 95% for three consecutive years.</p>	<p>This recommendation conflicts with CPD's requirements as outlined in the IGA. CPD will ensure compliance with Section 4 – Selection, Assignment, and Performance of SRO that requires: The SRO eligible list shall include police officers who have applied or been recruited for the SRO program and who meet the following screening criteria developed by CPO and CPS:</p> <ul style="list-style-type: none"> i. a minimum of three (3) years of service; ii. an excellent disciplinary history, which means: <ul style="list-style-type: none"> a. no sustained Complaint Register ("CR") allegations within the past five years involving excessive use of force; b. no sustained CR allegations within the past five years where the sustained finding directly relates to a verbal or physical interaction with a juvenile, or the sustained finding directly relates to verbal action or physical conduct that occurred on school grounds; c. no open or pending CR which, upon review of the evidence underlying such complaint(s), indicates in the judgment of the Department as determined by the CPO Chief of Internal Affairs that a reasonable probability exists that the officer may receive discipline covered by items (a) or (b) above.

Recommendation Q35:

SROs should receive mandatory specialized training paid for by CPD budget. SROs must complete all trainings prior to being in a school. SROs should be trained in restorative justice practices. Topics should include: adultism, sexism, racism, homophobia, transphobia, immigration rights, mental health, first aid, de-escalation tactics, an understanding of the culture and climate of the school and community. SROs should be trained in supporting diverse learners and ELL students.

This recommendation significantly aligns with CPD's enhanced training requirements as outlined in the IGA.

CPD will ensure compliance with Section 4 – Selection, Assignment, and Performance of SROs requires:

B. Prior to their assignment to the Designated Schools, all SROs shall have completed initial standard police officer training, including but not limited to, National Association of School Resource Officers (NASRO) forty (40) hour session of courses or replacement training approved by the federal monitor, plus a supplemental eight (8) hours of additional Chicago-specific training, including CPD protocols and CPS protocols. CPD will engage with community-based stakeholders for input on the development of any replacement training. In addition to the standard training, SROs shall have completed annual CPS training prior to their assignment to the Designated Schools which shall include, but not be limited to, the following areas: building relationships with youth; de-escalation training; restorative practices; school-based legal topics including CPS Student Code of Conduct; youth development; training on disability and special education issues; youth crisis intervention; implicit racial bias, and training regarding student interaction with specific student groups such as limited English proficiency, LGBTQIA, homeless students and sensitivity around immigrant student situations. Each SRO shall also complete refresher trainings every August consisting of an additional thirty-two (32) hours of content, with the following improvements to the curriculum:

- cultural sensitivity and implicit racial bias, with specific emphasis on how implicit bias is manifested in working with students
- LGBTQIA awareness and associated CPS policies
- Office of Diverse Learner Supports and Services (Special Education) awareness and CPS policies
- Additional emphasis on de-escalation protocols
- Additional NASRO refresher on SRO role as mentor/lecturer/counselor or replacement refresher approved by the federal monitor

	<ul style="list-style-type: none"> - Additional CPS refresher on Restorative Justice/CPS Code of Conduct and this Agreement (including roles and responsibilities) - CPD pre-arrest options and the appropriate exercise of discretion by sworn officers <p>CPD shall provide mandatory Crisis Intervention Training for Youth sessions for the SROs which will become part of the refresher training curriculum. Also CPD shall work to reduce class size for training sessions to no more than fifty (50) SROs per session and ensure that all sessions collect participant evaluation forms.</p>
<p>Recommendation Q36:</p> <p>Schools should include LSCs and a student committee of at least three students in the hiring process.</p>	<p>This recommendation conflicts with CPD's requirements as outlined in the IGA.</p> <p>CPD will ensure compliance with Section 4 – Selection, Assignment, and Performance of SROs that states:</p> <p>A. CPD, in consultation with CPS principals, shall choose SRO candidates for each school no later than the end of August of each school year from an SRO eligible list created by CPD. Principals may participate in interviews with SRO candidates, reject any candidate, and request that CPD provide another candidate for consideration. The SRO eligible list shall include police officers who have applied or been recruited for the SRO program and who meet the following screening criteria developed by CPD and CPS:</p> <ul style="list-style-type: none"> i. a minimum of three (3) years of service; ii. an excellent disciplinary history, which means: <ul style="list-style-type: none"> a. no sustained Complaint Register ("CR") allegations within the past five years involving excessive use of force; b. no sustained CR allegations within the past five years where the sustained finding directly relates to a verbal or physical interaction with a juvenile, or the sustained finding directly relates to verbal action or physical conduct that occurred on school grounds; c. no open or pending CR which, upon review of the evidence underlying such complaint(s), indicates in the judgment of the Department as determined by the CPO Chief of Internal Affairs that a

reasonable probability exists that the officer may receive discipline covered by items (a) or (b) above.

SROs should:

- working knowledge of Department directives; juvenile laws; and Chicago Public Schools Student Code of Conduct;
- ability to work safely, effectively, and build positive relationships with students, parents, guardians and school personnel;
- previous experience working with youth in a learning environment (e.g., coaching youth league or youth group leader);
- ability to problem-solve in a team environment;
- college or other comparable experience with an emphasis on youth studies;
- quality report writing skills; and
- enthusiasm for the position with an ability to work with school administration, students and parents.

- x. In the event the criteria constituting "an excellent disciplinary history" as set forth in Section 4 A ii are found either to violate the provisions of the collective bargaining agreement between the City and the Fraternal Order of Police, Lodge No. 7 or the City's bargaining obligations under the Illinois Labor Relations Act, 5 ILCS 315, the City and CPS shall immediately meet and negotiate substitute criteria.

In order to be eligible for inclusion in the SRO program, each officer must participate in an interview with the CPO Chief of the Bureau of Operations, or the Chief's designee where the above criteria and overall career performance of the officer are discussed. Following such interview, the CPD Chief of the Bureau of Operations, or the Chief's designee must determine whether in his/her judgment that each officer is an appropriate fit for the SRO program.

By August 1, 2020 and each year thereafter, the CPD Chief of the Bureau of Operations shall provide to the Board's Chief Officer of Safety and Security a written attestation that (i) all incumbent SROs and (ii) all new SROs added to the eligibility list have been successfully vetted through the aforementioned screening criteria.

	<p>Incumbent SROs who do not meet the selection criteria shall be replaced.</p>
<p>Recommendation Q37: Schools should have full access to the candidates' backgrounds and police records.</p>	<p>This recommendation conflicts with CPD's requirements as outlined in the IGA. CPD will ensure compliance with Section 4 – Selection, Assignment, and Performance of SROs as outlined above (Q36).</p>
<p>Recommendation Q38: Candidates are required to pass through three rounds of interviews with the principal, student committees and LSCs, with the LSCs having the final approval.</p>	<p>This recommendation conflicts with CPD's requirements as outlined in the IGA. CPD will ensure compliance with Section 4 – Selection, Assignment, and Performance of SROs as outlined above (Q36).</p>
<p>Recommendation Q42: The final school decision should be made by the LSC.</p>	<p>This recommendation conflicts with CPD's requirements as outlined in the IGA. CPD will ensure compliance with Section 11- Complaint Process: Investigations that requires: CPD shall provide school administrators, students and staff with a complaint process described on the Civilian Office of Police Accountability (COPA) website to promote a swift review and resolution of complaints by CPS including, but not limited to, removal of such SRO, if necessary, from performing Services under this Agreement. The SRO Coordinator will work with COPA and the CPD District Commander who has the authority to remove an SRO from performing Services under the Agreement if deemed necessary and in compliance with all applicable labor agreements. Regular updates of new complaints and status of open complaints will be provided to CPS during the bi-weekly meetings held between CPS and CPD. Notwithstanding the foregoing, it is understood and agreed that any CPS principal shall have the authority to remove an SRO from his/her school after the complaint process has come to final resolution. Additionally, any investigations conducted by CPS which include a member of the Department acting in his or her capacity as an SRO or which involve any other CPD officers on duty conduct shall be shared with the SRO Coordinator.</p>

Recommendation Q48:

Schools should not share student data or records with CPD police officers, and they shouldn't seek to access student data or records, except to the limited extent needed to respond to an imminent health or safety emergency. Example: Police may need to know, in an emergency situation, that a student has asthma and needs access to an inhaler. This does not warrant sharing access to the student's medical records.

This recommendation conflicts with CPD's requirements as outlined in the IGA.

CPD will ensure compliance with Section 15, Access to Education Records that requires:

- A. School administrators shall allow SROs to inspect and copy any public records maintained by the school to the extent allowed by state and federal student privacy laws, including ISSRA and FERPA, and CPS policies and guidelines.
- B. In connection with an emergency, school administrators shall disclose to the SRO that information in a student's record that is necessary to protect the health or safety of the student or other persons, subject to FERPA and the regulations of the U.S. Department of Education, and based on the seriousness of the threat to someone's health or safety, the need of the information to meet the emergency situation, and the extent to which time is of the essence.
- C. If confidential student record information is needed by an SRO, but no emergency situation exists, the information may be released only as allowed by ISSRA, FERPA or other law.
- D. SROs are subject to CPO General Order G10-01-03 and will operate in compliance with that General Order at all times. SROs are prohibited from entering any information into the Criminal Enterprise Information System (CEIS).
- E. SROs shall comply with City of Chicago Municipal Ordinance 2-173, which made the City of Chicago a Welcoming City. No SRO shall unlawfully discriminate against students or student family members based on their immigration status as prohibited by Board Resolution 16-1216-RSS and the Board's Comprehensive Non-discrimination Policy (19-0522-P01) as either may be hereafter amended from time to time.

CPD RESPONSE TO SRO WORKING GROUP RECOMMENDATIONS: Not Related to CPD SRO Policy

CPD Response	
<p>While all the recommendations listed below are related to the SRO program and the SRO Working Group process, these specific recommendations are beyond the scope of CPD's SRO policy.</p> <p>However, CPD and other City of Chicago entities are continuing to review and evaluate the effectiveness and viability of CPD's SRO program in the development of a comprehensive school community safety strategy that is reflective of the input and needs of the community. Additionally, CPD continues to work toward developing appropriate mechanisms and processes for offering the community meaningful opportunity to review and comment on material changes to CPD's policies and procedures. These working group recommendations provide significant opportunities for CPD and the City to consider while continuing this development process. CPD and the City remain committed to reviewing these recommendations and will continue to engage the community as well as other stakeholders, including the Independent Monitoring Team, in this process.</p>	
Working Group Recommendations:	19
<p>Recommendation Q1:</p> <p>There should not be a law enforcement presence in Chicago Public Schools. Accordingly, CPD should stop assigning police officers as SROs and all resources should be returned to the schools by the City of Chicago.</p> <p>A. And replaced with other resources as deemed appropriate by the entire school community including: Students / Staff / Faculty / Parents We can reimagine how schools operate and the funds would pay for, "...school staff trained to ensure safe and positive school climates, such as community intervention workers, peacebuilders, behavior interventionists, transformative or restorative justice coordinators, school aides, counselors and other support staff, can and do prevent and address safety concerns and conflicts. These staff monitor school entrances and ensure a welcoming environment, respond to the root causes of conflict and disruptive behaviors, prevent and intervene to stop intergroup and interethnic tension, and address students' needs."</p> <p>B. All remaining funds currently being used to pay CPD to be in CPS need to be channeled to CPS. In addition Chicago should not only replace the funding currently allocated to the SRO program in CPS schools but in addition divert 2% of CPD's entire funding to Chicago's schools.</p> <p>C. Access to resources should not be only in exchange for SRO funding</p>	
<p>Recommendation Q2:</p> <p>There need to be mechanisms in place that aren't addressing student misconduct in a criminal way. Police in schools makes that inevitable. Misbehavior should be an expectation-they are kids. The intervention of an SRO automatically characterizes a student's misbehavior as criminal as opposed to inappropriate.</p>	
<p>Recommendation Q3:</p> <p>The working group model should continue. Surveys are not enough. There needs to be a mechanism for sharing perspectives and research.</p>	

Recommendation Q4:

The public working group should work in coordination with the workgroup made up of young people.

Recommendation Q5:

The advisory board: The City and CPD should outsource the selection process of the working group members. They should appoint a group of lawyers, young people, CPS alumni, parents, students, teachers, school staff, LSC members, service providers, restorative and transformative justice experts, community members, and community organizers who will select the working group members based on open applications.

Recommendation Q6:

Selection of working group members: The working groups should be diverse in age, race, ethnic background or origin, genders, geographical living situation, and income. They should include teachers, students, CPS alumni, parents of CPS students, LSC members, CPS volunteers, people with lived experiences of police brutality, experts, faculty, counselors, faith and community leaders. i. Participants of the working group should never be asked to disclose personal information – like immigration status – in order to participate.

Recommendation Q7:

Facilitators: The working group members should select an internal facilitator.

Recommendation Q8:

Times and meetings: Working group members should select days and times of meetings with the help of CPD.

Recommendation Q9:

Structure of workgroup meetings: the first meeting should allow for input from the workgroup on how they want to utilize the various meetings.

Recommendation Q10:

Timeline: The SRO Working Group members should be selected sometime in late May or June and should begin working in early summer. The final recommendations should be made before the start of the school year.

Recommendation Q11:

Recommendations should go to the CPD, the Independent Monitoring team, as indicated under the consent decree.

Recommendation Q12:

The working group should meet with decision makers from CPD, CPS, and the Mayor's Office on Public Safety and Violence Reduction throughout the process to have a two-way conversation about the policy review process.

Recommendation Q13:

All recommendations made by working groups should be applicable to the current school year.

Recommendation Q14:

Working groups should be able to say, within realistic grounds, when recommendations should be implemented.

Recommendation Q15:

Recommendations made: After the working group drafts its final recommendations, CPD, the Mayor's office of Public Safety and Violence Reduction, and CPS should meet to discuss said recommendations. These meetings should happen before the final SRO policy is made, and should be made before the intergovernmental agreement between CPS and CPD is made.

Recommendation Q16:

After the Mayor's office of Public Safety and Violence Reduction, CPD, and CPS meet to discuss the working group's final recommendations, representatives from these offices should meet with the working group to share their response to said recommendations. The working group should then be allowed to share their response in a follow-up meeting with representatives from these offices.

Recommendation Q17:

All recommendations made by the previous working groups should be made available to future working groups.

Recommendation Q18:

CPD and the Mayor's office of Public Safety and Violence Reduction must provide relevant documents (including drafts) to the group in a timely fashion. Notes, policies, and other relevant material should be available upon request from the working group.

Recommendation Q19:

Ongoing review: The CPD and the Mayor's office of Public Safety and Violence Reduction should work to ensure that ongoing and continuous review of the program happens even beyond the working groups that make recommendations.

CPD RESPONSE TO SRO WORKING GROUP RECOMMENDATIONS: CPS-Related Concern

CPD Response	
<p>While all the recommendations listed below are related to the SRO program, these specific recommendations are beyond the scope of CPD's SRO policy.</p> <p>However, consistent with the working group process, these recommendations will be provided to Chicago Public Schools (CPS) and other City of Chicago entities who are continuing to review and evaluate the effectiveness and viability of CPD's SRO program in the development of a comprehensive school community safety strategy that is reflective of the input and needs of the community. There remains a commitment to reviewing these recommendations and determining the feasibility of implementation.</p>	
Working Group Recommendations:	5
<p>Recommendation Q30:</p> <p>Each assigned SRO's name and star/badge number should be publicly posted in the school main office and on the school website.</p>	
<p>Recommendation Q33:</p> <p>Education information (shared verbally or otherwise): CPS should not be share education information with CPD unless the disclosure is both legally permissible under ISSRA, IMHDDCA, and FERPA; and legally mandated by court order or subpoena. This includes informally sharing information about IEP's and disability related information, discipline information, family information, etc. Medical and health information should only be shared if the student is having an imminent health issue and needs immediate assistance (asthma, diabetes, seizures, etc.). Mental Health information: If a student is having a mental health crisis, CPS staff should be deescalating the student according to their IEP. If that is not sufficient, CPS staff should call be calling screening, Assessment, and Support Services (SASS). CPD should not be responding to a student in a mental health crisis. If SASS is unavailable, or if CPD is erroneously called, only a Crisis Intervention Team (CIT) trained CPD officer should be responding. CPS should only share limited and essential information about the student's mental health with the CPS officer. A student's IEP or other mental health records should not be shared in such an emergency.</p>	
<p>Recommendation Q43:</p> <p>Information will be shared during monthly CPS board meetings.</p>	
<p>Recommendation Q44:</p> <p>LSC's provide a monthly SRO update to their school community.</p>	
<p>Recommendation Q47:</p> <p>Resources allocated for SROs should remain with the school if the SRO position is eliminated for any reason, such as voted out by the Local School Council (LSC). If an SRO is removed funds do not go back to CPD, but instead stay with the school.</p>	

School Resource Officer (SRO) Working Group Recommendations Not Accepted By CPD

SRO Working Group Recommendations:	3	Department Response
<p>Recommendation Q40: Complaints are documented in ASPEN</p>		<p>CPD will not incorporate this recommendation.</p> <p>Pursuant to its authority outlined in the Municipal Code of Chicago, COPA will be the lead agency in recording and documenting complaints and allegations of misconduct by all CPD officers, including SROs.</p> <p>CPD will ensure compliance with Section 11 – Complaint Process of the IGA that requires::</p> <p>CPD shall provide school administrators, students and staff with a complaint process described on the Civilian Office of Police Accountability (COPA) website to promote a swift review and resolution of complaints by CPS including, but not limited to, removal of such SRO, if necessary, from performing Services under this Agreement. The SRO Coordinator will work with COPA and the CPD District Commander who has the authority to remove an SRO from performing Services under the Agreement if deemed necessary and in compliance with all applicable labor agreements. Regular updates of new complaints and status of open complaints will be provided to CPS during the bi-weekly meetings held between CPS and CPD. Notwithstanding the foregoing, it is understood and agreed that any CPS principal shall have the authority to remove an SRO from his/her school after the complaint process has come to final resolution. Additionally, any investigations conducted by CPS which include a member of the Department acting in his or her capacity as an SRO or which involve any other CPD officers on duty conduct shall be shared with the SRO Coordinator.</p>
<p>Recommendation Q46: If fired, SRO should receive discipline from CPD.</p>		<p>CPD will not incorporate this recommendation.</p> <p>Current CPD policy outlines the complaint and discipline procedures for any complaint or allegation of misconduct, including the investigative procedures and disciplinary actions.</p> <p>Additionally, CPD will ensure compliance with the IGA that provides:</p> <p>SROs shall be subject to the direction of the Superintendent of Police or his/her designee and must observe all standards of conduct</p>

	<p>required by CPD.</p> <p>Section 11 – Complaint Process:</p> <p>CPD shall provide school administrators, students and staff with a complaint process described on the Civilian Office of Police Accountability (COPA) website to promote a swift review and resolution of complaints by CPS including, but not limited to, removal of such SRO, if necessary, from performing Services under this Agreement. The SRO Coordinator will work with COPA and the CPD District Commander who has the authority to remove an SRO from performing Services under the Agreement if deemed necessary and in compliance with all applicable labor agreements. Regular updates of new complaints and status of open complaints will be provided to CPS during the bi-weekly meetings held between CPS and CPD.</p> <p>Notwithstanding the foregoing, it is understood and agreed that any CPS principal shall have the authority to remove an SRO from his/her school after the complaint process has come to a final resolution. In addition, any investigations conducted by CPS which include a member of the Department acting in an on-duty capacity as an SRO or which involve any other CPD officers on duty shall be shared with the SRO Coordinator.</p>
<p>Recommendation Q51:</p> <p>CPD officers in schools should not be accessing police databases for information about students.</p>	<p>CPD will not incorporate this recommendation. CPD will ensure compliance with the IGA that provides that CPDs primary responsibility is to provide public safety. In accordance with the IGA, SROs need to be able to provide law enforcement and police services to the school, school grounds and areas adjacent to the school; investigate allegations of criminal incidents per police department policies and procedures; and enforce state and local laws and ordinances.</p>