: EVALUATION OF THE DEMOGRAPHIC smpacts of the chicago police Department's h i ri ng-process

CITY OF CHICAGO

OFFICE OF INSPECTOR GENERAL

JOSEPH M. FERGUSON
INSPECTOR GENERAL FOR THE CITY OF CHICAGO

DEBORAH WITZBURG
DEPUTY INSPECTOR GENERAL FOR PUBLIC SAFETY

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ACRONYMS

CAPS	Community Alternative Policing Strategy
CFD	Chicago Fire Department
ChIPPS	Chicago Integrated Personnel and Payroll System
CPD	Chicago Police Department
CPOE	Chicago Police Officer Examination
CPS	Chicago Public Schools
DHR	Department of Human Resources
HR	Human Resources
HRB	City of Chicago Human Resources Board
ILETSB	Illinois Law Enforcement Training and Standards Board
LEADS	Law Enforcement Agencies Data System
OEMC	Office of Emergency Management and Communications
OPSA	Office of Public Safety Administration
PHQ	Personal History Questionnaire
PO	Police Officer
POWER	Peace Officer Wellness Evaluation Report

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IMPACTS OF THE CHICAG DEPARTMENT'S HIRING I

The standardized test, physical fitness test, and background investigation were the stages in the hiring process that most decreased the Black makeup of the candidate pool.

Black Candidates saw a 19 percentage point drop in their share of the applicant pool during the application process, from 37% of the initial applicant pool to 18% of those invited to the Police Academy.

> Conversely, Asian, Hispanic, and White candidates increased in their respective proportions of the applicant pool by the end of the process.

Female candidates completed fewer applications than male candidates at the start of the process, comprising 34% of the initial pool-and became increasingly less represented throughout the process, eventually comprising just 27% of those invited to the Academy.

CPD Human Resources and the City's Department of Human Resources do not track unique individuals through the hiring process, limiting the potential for pattern and trend analyses that might lead to more equitable processes.

OIG FILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

I. EXECUTIVE SUMMARY

The Public Safety section of the City of Chicago Office of Inspector General (OIG), including its Diversity, Equity, and Inclusion Director and together with OIG's Compliance Unit, conducted an evaluation of the demographic impacts of the Chicago Police Department's (CPD) multi-stage hiring process. Those wishing to become a Police Officer (PO) must complete an application with the City and successfully navigate numerous stages designed to evaluate a candidate's cognitive ability, physical fitness, personal background, physical and mental health, and other predictors of job performance. By the end of this year-and-a-half long process, a narrowed pool of individuals are invited to CPD's Academy as recruits. After successfully completing the Academy in six months, new CPD members spend twelve months as Probationary Police Officers, to complete an 18-month total probationary period. The objectives of this evaluation were to determine whether there are patterns in attrition rates for different demographic groups in the hiring process and which specific stages of the hiring process most impact the demographic composition of the candidate pool. Additionally, OIG assessed whether CPD's applicant data allowed for unique applicants to be tracked throughout the hiring process; the time it took applicants to complete the hiring process; and the race, gender, preference status, and neighborhood of residence for candidates whose applications succeed through the entire hiring process and were therefore invited to enroll in CPD's Academy.

OIG found that Black candidates, while comprising 37% of the initial applicant pool, comprised just 18% of the pool of candidates invited to the Academy. Conversely, Asian, Hispanic, and White candidates increased in their proportion of the applicant pool by the end of the hiring process.[1] In addition, OIG found that female candidates submitted fewer applications than male candidates at the start of the hiring process, comprising 34% of the initial pool. The proportion of

female applicants decreased throughout the process, such that female candidates comprised just 27% of those invited to the Academy.

OIG determined that the standardized test (Chicago Police Officer Exam), the physical fitness test (Peace Officer Wellness Evaluation Report), and the background investigation were the stages in the process that most decreased the representation of Black candidates in the candidate pool. Black male candidates experienced the highest attrition rate in the background investigation stage relative to all other candidates, while Black female candidates experienced the highest attrition rate in the physical fitness test stage relative to all other candidates. Additionally, the attrition rate in the physical fitness test was higher for female candidates of all races compared to their male counterparts.

In examining the reasons for candidate attrition evident from available applicant data, OIG concluded that higher no-show rates and higher failure rates for Black candidates compared to

[1] CPD collects data on candidate race/ethnicity differently at different stages of the PO hiring process. In some stages, candidates are asked whether they identify as ethnically Hispanic and are asked separately about their racial self-identification. In other stages, candidates are asked to give their racial self-identification, with "Hispanic" as an option, and are not asked separately about their ethnic self-identification. Throughout this report, OIG reports race/ethnicity data in the terms that CPD uses for its data collection

other racial/ethnic groups drove the disproportionately high attrition rates in the standardized test and physical fitness test stages for Black candidates. In addition, in the physical fitness test, female applicants had higher no-show rates than their male counterparts, and Black female, Hispanic female, and White female candidates had higher failure rates than their male counterparts, contributing to the high female attrition at this stage. OIG further found that CPD's elimination of its standardized test payment requirement in 2016 reduced, but did not entirely eliminate, the disproportionate attrition of Black candidates at this stage by increasing test turnout.

OIG reviewed the employee data for candidates who successfully completed the hiring process and entered.the Academy. The available evidence suggests that CPD's process preferences for applicants who are veterans of the U.S. Armed Forces and graduates of Chicago Public Schools high schools seemed to benefit non-White applicants, potentially improving the racial/ethnic diversity of the pool of recruits; the veterans status seemed to benefit male candidates, potentially worsening the gender imbalance in the Academy. Moreover, OIG found that Academy recruits were clustered by neighborhood. Poorly represented geographic areas of the city may warrant the targeting and tailoring of future CPD recruitment efforts.

In the course of this evaluation, OIG used data from multiple sources including City of Chicago Department of Human Resources (DHR) and CPD Human Resources (CPD HR), and found that individual applicants are not assigned unique individual ID numbers. This means, for example, that DHR and CPD HR cannot identify when a single individual has submitted multiple applications and cannot track patterns in candidate attrition by education level or neighborhood of residence through each stage of the hiring process. This limits the scope of this analysis as well as any analysis CPD or DHR may wish to undertake. Additionally, OIG identified inconsistent labels and categories for demographic characteristics across data sources.

OIG recommends that CPD evaluate the stages of its hiring process for biases that have most contributed to the

disproportionate attrition of Black and female candidates. CPD should further assess whether the tests and standards with inequitable outcomes are valid predictors of high job performance, and if not, what modifications might be appropriate. Furthermore, OIG recommends that CPD seek to remediate major drivers of attrition through targeted outreach to reduce no-shows and efforts to boost candidate preparedness.

CPD and OPSA responded jointly to the report and agreed with all 17 of OIG's recommendations. In their response letter, CPD and OPSA committed to several changes to their hiring process with expected implementation in the near term, including a change such that "a candidate who does not successfully pass all components of the Pre-POWER test will no longer be automatically disqualified" and a commitment to "post more detail about the disqualifying standards in the background investigation process." See Appendix D for the full details of CPD and OPSA's response.

II. BACKGROUND

With over 13,000 employees, the Chicago Police Department (CPD) is the largest department in the City of Chicago, accounting for approximately 41% of the City's workforce.[2] The vast majority of CPD's total employees are Police Officers (POs); they number nearly 11,000, or 83% of CPD's total employees.[3] "Police Officer," as used throughout this report, is the entry level rank of peace officers within CPD and is distinct from the supervisory ranks, including Sergeant and higher.[4] To become a PO, a candidate must first be hired as a Probationary Police Officer and then successfully complete an 18-month probationary period. The hiring process for POs includes numerous stages designed to evaluate a candidate's cognitive ability, physical fitness, personal background, physical and mental health, and other predictors of job performance. The majority of candidates who apply to become a PO will be eliminated at one of these stages. The reasons for attrition are varied: candidates may fail to meet a prescribed standard on the written exam or physical fitness test; disqualifying information may be discovered in the background check, drug test, or medical exam; candidates may fail to appear for a required stage or may fail to submit required paperwork.

This report evaluates the demographic diversity of the PO candidate pool at various stages throughout CPD's hiring process and the equity of the process itself, examining demographic patterns of candidate attrition at each stage from initial application through referral to the Department of Human Resources (DHR) for invitation to the Academy.

A. EQUITABLE HIRING AND POLICE DEPARTMENT DIVERSITY

CPD is bound in its hiring and other employment practices to comply with Equal Employment Opportunity laws, and therefore cannot discriminate against candidates on the basis of any protected class, including race, color, religion, national origin, or sex[5]-the last of which is a protected class that the Supreme Court of the United States recently held to extend to gender identity and sexual orientation.[6] However, even employment practices that do not expressly discriminate against some candidates may still have a disparate impact on certain demographic groups, given the broader social context in which the choices and decisions of the employer and the candidates are embedded. For example, while all candidates for a position may be required to sit for testing, neighborhood segregation may mean that a testing location is less accessible to one racial group than to another. In this example, the hiring process may be equal in a formal

[2] City of Chicago Office of Inspector General, "City of Chicago Active Employee Demographics," Information Portal, accessed March 4, 2021, <https://informationportal.igchicago.org/citv-of-chicago-active-employees/>.
[3] City of Chicago Office of Inspector General, "City of Chicago Active Employee Demographics."
[4] In the rank of Police Officer, CPD members may be assigned as Detectives, Field Training Officers, Evidence Technicians, etc.
[3] U.S. Equal Employment Opportunity Commission, "Rules and Guidance," accessed March 4, 2021, <https://>www.eeoc.Rov/statutes/laws-enforced-eeoc <http://www.eeoc.Rov/statutes/laws-enforced-eeoc>.
[6] In Bostock v. Clayton County, Georgia, 140 S. Ct. 1731 (2020), the Supreme Court of the United States held that an employer who fires an individual employee merely for being gay or transgender violates Title VII of the Civil Rights Act of 1964 prohibition on employment discrimination "because of . sex." U.S Supreme Court, "Bostock v. Clayton County, Georgia," accessed March 4, 2021, <https://www.supremecourt.gov/opinions/19pdf/17-1618> hfci.pdf.

sense, but it is not equitable. Equity in hiring involves identifying historical and structural barriers and addressing and remediating their impact on the employment process.

In political and media discourse, equitable hiring in police departments is often described as a means to an end: specifically, to build a diverse police force. Diversity of police departments is a central topic of concern to policing and public safety experts and practitioners. In recent public discourse, achieving police department diversity has been identified as a potential pathway to improved public safety outcomes, including improved trust between police and communities. A recent New York Times analysis of racial diversity in police departments nationwide reported, "researchers have found that greater diversity in police departments and local government boosts trust in those institutions in nonwhite neighborhoods."[7] A 2021 study published in Science using Chicago data concluded that "diversity reforms can improve police treatment of minority communities," after finding that "relative to white officers, Black and Hispanic officers make far fewer stops and arrests, and they use force less often, especially against Black civilians," with "effects . . . largest in majority-Black areas of Chicago."[8] Survey analysis showing that trust in police is much lower in Black and Hispanic communities than in White communities provides foundational context for the importance of investigations into how police force diversity may improve trust.[9]

Members of CPD's command staff and City government leaders have called for and highlighted the importance of diversity in hiring, but CPD has not articulated specific operational goals or strategies. In an interview with OIG in December 2019, CPD's then-Chief of the Bureau of Organizational Development stated that CPD aimed to have the Department reflect the demographic diversity of the City of Chicago. The consent decree entered in Illinois v. Chicago provides that, "CPD will assess its recruitment and hiring process" and that this assessment "will identify and consider," among other factors, "Department strategies for attracting and hiring qualified applicants that reflect a broad cross section of the Chicago community."[10] CPD's March 2021 job posting for PO voices the same commitment: "The Chicago Police Department is an equal opportunity employer that values diversity and looks for candidates that reflect our communities' broad cross-sections." Members of Chicago's City Council have likewise expressed the view that a greater presence of Black CPD members in predominantly Black neighborhoods

[7] Lauren Leatherby and Richard Oppel Jr., "Which police departments are as diverse as their communities?" New York Times, September 23, 2020, accessed March 4, 2021, <https://www.nytimes.com/interactive/2020/09/23/us/>bureau-justice-statistics-race.html.

[8] Bocar Ba, Dean Knox, Jonathan Mummolo, and Roman Rivera, "The role of officer race and gender in police-civilian interactions in Chicago," Science, 371, 696-702, February 12, 2021, accessed March 22, 2021, <https://>science.sciencemag.org/content/371/6530/696 <http://science.sciencemag.org/content/371/6530/696>.

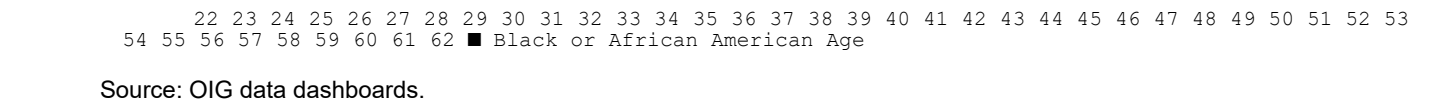
[9] Gilberstadt, Hannah, "A month before George Floyd's death, Black and White Americans differed sharply in confidence in the police," Pew Research Center, August 27, 2020, accessed March 4, 2021, <https://www>. pewresearch.org/fact-tank/2020/06/05/a-month-before-george-floyds-death-black-and-white-amencans-differed- <http://pewresearch.org/fact-tank/2020/06/05/a-month-before-george-floyds-death-black-and-white-amencans-differed->sharply-in-confidence-in-the-police/.

[10] Consent Decree HH 258-259, State of III. V. City of Chi., No. 17-cv-6260 (N D. III. Jan. 31, 2019) (Dkt. 703-1) ["consent decree"].

would reduce complaints and produce better police services.[11] During CPD's 2016-2018 hiring surge, with the publicly stated goal of increasing Black representation in the Department, then-Mayor Rahm Emanuel's administration "consistently stressed its intent to diversify the Chicago Police Department."[12]

Notwithstanding CPD's own stated intention to diversify and some gains in the representation of Black Academy entrants, the Department has not been successful in bolstering its representation of Black members. CPD's Training Academy class data shows that the proportion of Academy entrants that identified as Black increased from 16% in 2016 to 20% in 2018 during CPD's hiring surge. However, the representation of Black members of the Department at-large continued to decrease during this time. That is, the increase of Black representation within the Academy classes did not keep pace with the attrition of Black Department members.[13] Further, this attrition of Black CPD members is likely to continue, with the majority of current Black or African American CPD members nearing or already at retirement age, with 54% aged 45 or older and 39% aged 50 or older (Figure 1).

FIGURE 1: COUNT OF ACTIVE BLACK/AFRICAN AMERICAN CPD MEMBERS BY AGE



Source: OIG data dashboards.

[11] John Byrne, "Proportion of Black cops in Chicago Police Department likely to go down, watchdog says," Chicago

Tribune, August 24, 2020, accessed March 4, 2021,

<https://www.chicagotnbune.com/politics/ct-chicago-police->diversitv-report-20200824-krno3sffvza3vbuavunlxri2s4-story.html.

[12] Dan Hinkel and Jennifer Smith Richards, "Despite hiring push, Chicago police still falling short in attracting black officers," Chicago Tribune, May 4, 2018, accessed March 4, 2021, <https://www.chicagotribune.com/news/>breaking/ct-met-chicago-police-hiring-20180503-story.html.

[13] Dan Hinkel and Jennifer Smith Richards, "Despite hiring push, Chicago police still falling short in attracting black officers." Chicago Tribune, May 4, 2018, accessed March 4, 2021, <https://www.chicagotribune.com/news/breaking/>ct-met-chicago-police-hiring-20180503-storv html; Chip Mitchell, "For Black representation, police hiring spree an opportunity that came and went" NPR, July 9, 2019, accessed April 23, 2021, <https://www.npr.org/local/309/>2019/07/09/739822579/for-black-representation-police-hiring-spree-an-opportunity-that-came-and-

went; Todd
Feurer, "Public Safety Committee Chairman to call hearings on police suicides, minority hiring at CPD and CFD," CBS Chicago, February 18, 2020, accessed March 4, 2021, <https://chicago.cbslocal.com/2020/02/18/city-council-public->safety-committee-hearings-police-suicides-minority-hiring/.

Further, even CPD's own statement of purpose is unclear. In aiming to achieve a police department that "reflects" the demographics of the community or communities it serves, the "community" must first be understood: does CPD aim to reflect the city's overall demographics, or to reflect a community's demographics at the district, beat, community area, or ward levels? Chicago's neighborhoods are highly segregated, and matching the demographics of members to the population within each CPD district, for example, would require a very different deployment strategy than matching the demographics of all CPD members to the citywide population. Does "reflecting" the community literally mean matching CPD and citywide percentages of racial or ethnic representation, and at what point? Mirroring the racial/ethnic composition of the city among recruits invited to the Academy is a different task than aiming to have the entire force mirror the city in the near term, which would require much more aggressive recruitment of underrepresented groups. Lastly, and just as challenging, the relevant demographic classifications must be defined before any assessment or benchmarking of diversity can meaningfully take place. Race and ethnicity appear to be the central demographic concerns in most of the discourse about police diversity in Chicago, but diversity with respect to other demographic groups-including gender, religion, and national origin-may be equally important in realizing the community value that can flow from a diverse and representative police department.

Given the lack of clarity around CPD's own benchmarks for diversity in hiring, this evaluation reports findings and recommendations related to the issue of equity in the hiring process rather than the adequacy of diversity outcomes in CPD's hiring. In the analysis below, OIG interprets differing attrition rates for candidates of different demographic groups in the hiring process as an indicator that CPD needs to examine closely whether its processes, at particular junctures, are equitable. Recommendations focus on changes that CPD can make to identify and remedy currently inequitable hiring practices.

B. POLICE OFFICER RECRUITMENT AND HIRING PROCESS

Prior to the start of each PO application period, CPD, DHR, and the Mayor's Office hold a strategy meeting to establish goals for a recruitment and hiring plan. CPD's current efforts to recruit applicants include videos, open houses, fliers, direct outreach and education to aldermen and communities, and deployment of CPD community ambassadors. Under the Office of Community Policing, CPD uses approximately 99 Community Alternative Policing Strategy (CAPS) officers as ambassadors, who are meant to assist with recruitment in the communities in which they work as possible, while performing their regularly assigned duties. Furthermore, CPD has employed two vendors in recent recruitment efforts. For the 2016 Chicago Police Officer Exam (CPOE) administration, CPD retained a minority-owned business enterprise consultant, Brown-Farmer, to perform grassroots marketing aimed at the recruitment of Black applicants. CPD has also used the vendor Rose and Shield to create and monitor a digital marketing campaign.

1. JOB ELIGIBILITY FOR CPD PROBATIONARY POLICE OFFICERS

Applicants for the position of PO must meet the following age, residency, and minimum education requirements:

- Applicants must be at least 21 years by the time of hire in order to enter the Academy.
- Applicants must remain under the age of 40 for the duration of the hiring process. If an applicant reaches their 40th birthday at any point during the hiring process, that applicant will be disqualified from consideration.
- Applicants must be residents of the City of Chicago before commencing work for CPD, but are not required to be city residents at the time of application.
- Applicants must be U.S. citizens or legal residents.
- Applicants must have at least 60 semester hours or 90 quarter hours from an accredited college or university.
    - o The education requirement may be waived if an applicant has served three continuous years on active duty in the U.S. Armed Forces, o The education requirement may be reduced to 30 semester hours or 45 quarter hours from an accredited college or university if an applicant has served one continuous year in active duty in the U.S. Armed Forces.

. 2. CPD HIRING PROCESS AND FAILURE POINTS

In order to become a Chicago Police Officer, eligible applicants must successfully pass through the steps listed below in Figure 2. The first three steps (application eligibility screening, CPOE administration, and police screening) are managed by DHR. With the creation of the City's Office of Public Safety Administration (OPSA) in 2019, however, management of some or all of these steps may shift in future hiring cycles to this new agency.[14]

FIGURE 2: PO HIRING STEPS AND POINTS OF FAILURE

Hiring Steps for CPD PO	Possible Points of Failure
1. Application through City screening[15] 2. Chicago Pol (CPOE) 3. Police screenin (physical fitness test) 5. Dr qualification screening #1 Background investigation physical fitness test) 10. D exam	• Failure to appear for testing or voluntary withdrawal at any stage. • Failure to demons abilities at one of the following stages: o CPOE o POWER tests o CPD Training Aca Evaluation • Disqualifying findings in one of the following stages: o Police screening

[14] In October 2019, the City of Chicago announced the consolidation of certain administrative functions of CPD, Chicago Fire Department (CFD), and the Office of Emergency Management and Communications (OEMC) into a single new agency, to be known as the Office of Public Safety Administration (OPSA). In January 2020, CPD's former Director of Human Resources became an employee of OPSA, according to Chicago Integrated Personnel and Payroll System records. In July 2020, Mayor Lightfoot announced the appointment of Annastasia Walker as the Executive Director of OPSA. In November 2020, during OPSA's City Council budget hearing, Executive Director Walker confirmed that OPSA would fulfill certain HR functions for CPD, CFD, and OEMC going forward. Consequently, the recommendations in this report that implicate CPD's HR function are directed jointly to CPD and OPSA [lb] An application fee of $30 was required for the April 2016 test administration but discontinued thereafter.

CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

12. Psychological assessment
13. Minimum qualification screening #2
14. Review of required documentation
15. Indebtedness check
16. CPD Training Academy
17. Field Training and Evaluation
    - o Drug tests
    - o Minimum qualification screenings o Polygraph
    - o Background investigation
    - o Medical exam
    - o Psychological assessment
    - o Indebtedness check Injury, aging out of the maximum permitted starting age of 40 years, or other disqualifying change to applicant circumstances.

Source: OIG analysis.

A candidate may be eliminated in the hiring process by failing to appear ("no-show") or withdrawing themselves from consideration, by failing to meet a prescribed standard, by receiving disqualifying results in the background check, drug test, or medical exam, or by experiencing a change in their eligibility or qualifying circumstances (e.g., their age). In recent years, CPD has begun providing smaller, more frequent test administrations and offering multiple testing dates at more locations across the city, whereas it previously offered only one CPOE test date at one location per year. CPD also offers free preparation sessions for the CPOE and POWER tests, and sends email reminders and distributes preparation materials for the POWER tests. CPD held its last in-person exam administration in January 2020 prior to the COVID-19 pandemic, and has plans to hold virtual exams in June 2021.

OIG FILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

FIGURE 3: PO HIRING PROCESS-STATUS, REQUIREMENTS, AND DURATION [16]

Status iK- Duration

Applicant/ Candidate

A feci'ian Juration for successful canJiJafes; Approx. 1.4 years

Application through City
CAR!-LRS job portal unci
eligibility screening

Chicago Police Officer Examination (CPOE)

Police screening

POWER lest SI

Drug test It 1

Minimum qualification screening //1

Polygraph Background investigation

POWER test #2

Drug test 111

Medical exam Psvcholomca! assessment

Minimum qualification screening w2

Review of required
documentation Indebtedness check

Refer to DI 1R

'Candidate submits application to DHR via Chicago CAREERS website 1 Candidate may claim preferential status wilh proof \l. Candidate must meet age and educational requirements
!DI !R contracts with vendor to administer the CPOE
1 Exam consists of 80 muliiple-choice questions ■ 2 Pass'fail scoring to advance in the process
j 1 DHR screens for preferences claimed at the time of application
2 DI IR creates referral list first of candidates with preference status then of remaining candidates in lottery order and forwards to CPD I IR.

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;CPD adminsiters the fitness test to candidates, consisting of four assessments ! I I 5-mile run ¦2 Sit-ups
3 Bench press -1 Sit & reach
CPD sends candidates to a drug testing vendor. Candidates must have valid prescription for any prescription-only medications
CPD completes an initial qualification screening to ensure candidate meets the following
1 Candidate must have at least 60 semester hours (90 quarter hours) from an accredited college or university
2 College requirement may be waned if applicant has at least three years of active duty or 30 semester hours from an accredited college and has served active duty CPD contracts with a vendor to complete the polygraph exam. Candidates are required to provide information to be verified during background investigation
CPD contracts with a vendor to complete the background invesigation of prospective applicants "flic vendor completes the following
1 Review of documents
2 Home interview
3 Employment history review
4 Criminal background check
CPD adminsiters a second fitness test to candidates, consisting of four assessments
1 1 5-mile run
2 Sit-ups
3 Bench press
4 Sit & reach
CPD sends candidates to a drug testing \endor <file:///endor> Candidates must have valid prescription for any prescription-only medications
CPD contracts with a vendor to complete the medical exam. The vendor completes
1 Medical fitness evaluation
2 Physical fitness evaluation
CPD contracts with a vendor to complete the mental health assessment ;CPD completes an second qualification screening before hiring to ensure candidate j meets the following-
1 Must have valid Illinois driver's license
2 Must be U S citizen or a legal resident
3 Must be resident in the City of Chicago
4 Must have Firearm Owners Identification (FOID) card

CPD completes final review of required documents

CPD ensures candidates do not owe any outstanding debts to the City of Chicago jCPD provides a referral list to DI IR of all qualified candidates for invitation to the Training Academv

CPD Training Academv -CPD provides recruits with classroom and experiential training

Probationary Police i Officer (PPO) -J
Approx 12 months** !

Field Training and Evaluation

Remainder of Probationary Period

CPD provides PPOs with hands-on training with an experienced Field Training Officer

CPD assigns PPOs to District with seasoned officer

*The background investigation is the lengthiest step in CPD's hiring process
**In 2016, the total probationary period was lengthened from I 2 lo !ft months and includes time in the Acaden

Source: OIG analysis.

[16] CPD reports to OIG that the duration of some applicants' processes may have been lengthened by the fact that, during the period of analysis, CPD permitted 18-year-olds to begin the application process, while the minimum age for entry into the Academy was 21

3. MAJOR ATTRITION STAGES IN THE HIRING PROCESS The Chicago Police

Officer Exam (CPOE)

DHR manages the PO application stage and CPOE administration before providing CPD with a referral list of applicants to continue on in the process. Once DHR processes an application, it notifies the applicant of the date, time, and location of the CPOE through a Notice to Report, which also contains study guide information and instructions for the day of the exam. The CPOE consists of 80 multiple-choice questions designed to test an applicant's cognitive abilities and ability to effectively perform as a PO. The current test vendor, I/OSolutions,[17] developed the CPOE based on a national job analysis, identifying and testing for ten abilities deemed necessary to perform job-essential tasks, duties, and responsibilities of a PO: deductive reasoning, flexibility of closure, inductive reasoning, information gathering, problem sensitivity, selective attention, spatial orientation, verbal comprehension, verbal expression, and visualization.[18]

The City of Chicago contracts with a different vendor, currently CPS HR Consulting, to proctor and administer the CPOE, which was traditionally held at McCormick Place.[19] In May 2019, after the period of analysis, CPD began holding smaller test administrations at various City Colleges of Chicago campuses in an effort to increase test turnout.

After the CPOE, DHR completes the Police Screening for candidates who passed and provides a referral list to CPD HR, taking into account candidate preference claims. The City of Chicago offers preferences to certain types of qualified applicants. These include: (a) "Veterans' Preference" for veterans of the U.S. Armed Forces;[20] (b) "Line of Duty Preference" for family members of CPD, Chicago Fire Department, Illinois National Guard, or U.S. Armed Forces personnel who have died in the line of duty; and, most recently, (c) "CPS Preference" for graduates of Chicago Public Schools high schools. A candidate must claim preferential status during the initial application stage and provide related documentation. Qualified applicants with a preferential status can be considered for vacancies before other qualified applicants, provided that any collective bargaining agreements do not prohibit this.[21] Within each referral list DHR sends to CPD, at least 20% will be candidates with veterans' preference, provided there are enough qualified candidates claiming that preference.

[17] I/O Solutions is a consulting firm for public safety agencies that specializes in personnel selection through preparation and testing solutions.

[18] "Flexibility of Closure" is the ability to discern identifiable objects or patterns when they are mixed in with noise or other distracting material.

[19] CPS HR Consulting is a California-based vendor that provides a broad range of human resource services for governmental agencies.

[20] The City of Chicago Personnel Rules state that "qualified applicants who have served on active duty ... for a cumulative period of 180 days, and who have received an honorable or general discharge, may be awarded veteran's preference when application is submitted with proof of veteran status." City of Chicago Personnel Rule VI, Section 3, Subsection (a).

[21] CPD's Hiring Plan includes the qualifier that preferential status may only be considered provided that collective bargaining agreements do not prohibit it. OIG reviewed the collective bargaining agreements that CPD has with POs and did not identify any provisions that would be relevant to the preference system in hiring. In general, the POs' collective bargaining agreement does not cover applicants or candidates, because they are not members of the bargaining unit.

The Police Officer Wellness Evaluation Report (POWER test)

The POWER test is a physical fitness test with standards established by the Illinois Law Enforcement Training and Standards Board (ILETSB). According to the Illinois Administrative Code, police recruits in the State of Illinois must pass the fitness test "before they commence the Minimum Basic Standard Law Enforcement Training Course."[22] CPD's Academy training unit administers two POWER tests as part of its hiring process. CPD holds the first, or "Pre-POWER test," at the beginning of the hiring process with the goal of screening out candidates who will not meet the required physical standards before investing more resources in them. CPD administers the final test, or "POWER test" at the end of the hiring process in order to satisfy ILETSB requirements for recruits prior to starting training in the Academy.

However, ILETSB's requirements and recommendations for law enforcement agencies are at times unclear. ILETSB reported to OIG that the POWER test is typically administered by law enforcement agencies during the first week of the Training Academy and that recruits are required to pass the fitness test to remain in the Academy and begin coursework,

but in its POWER Test Booklet for law enforcement agencies it states that the test should be provided to candidates "prior to entering the academy."[23] Further, ILETSB's website FAQs state that "[the POWER Test] is not a hiring or selection standard," and ILETSB reported to OIG that if an agency administers any POWER test during the hiring process of Police Officers, it should be administered as an opportunity for candidates to assess whether they need to improve their performance rather than as an elimination step in the hiring process.[24] CPD's administration of its Pre-POWER test as an elimination stage is, then, permitted by ILETSB requirements and standards but may not align with ILETSB recommendations.

The chart below details the physical performance benchmarks candidates must meet to pass both the Pre-POWER and final POWER tests:

[22] "The Academy Director shall have the responsibility of administering the Board's Physical Fitness Training Standards to all trainees before they commence the Minimum Basic Standard Law Enforcement Training Course." III. Admin. Code. Tit. 20, § 1720.30, September 23, 2004, accessed April 23, 2021, https-//www.ilga.gov/commission/ <http://www.ilga.gov/commission/>icar/admincode/020/020017200A00300R.html.
[13] Illinois Law Enforcement Training and Standards Board, "POWER Test Booklet," accessed June 18, 2021, <https://www> ptb.illinois.gov/media/1320/power.pdf <http://ptb.illinois.gov/media/1320/power.pdf>.
[2]" ILETSB states that the POWER Test is not "part of the hiring or selection process for an agency." Illinois Law Enforcement Training and Standards Board, "POWER Test FAQ," accessed June 18, 2021, <https://www.ptb>.Illinois gov/resources/frequently-asked-questions-faq/ttP.O.W.E.R.-Test.

FIGURE 4: ILLINOIS POLICE OFFICER WELLNESS EVALUATION REPORT (POWER) TEST STANDARDS

Sit-ups/Minute	**37**	**34 31**
Bench Press % Body Weight		
Run 1.5 Miles		

Source: Illinois Law Enforcement Training and Standards Board.

There is no CPD policy stating how many re-tests are permitted for the Pre-POWER test, but according to CPD personnel, the Department began offering multiple invitations to retake the Pre-POWER test in an effort to remediate the high attrition rate at this stage.[25] CPD uses the Pre-POWER test as an elimination stage, against ILETSB guidance and without having instituted any policy to ensure consistency in how many re-test invitations may be offered to candidates. CPD does not retain records on which candidates were offered one or more invitations to re-test, and therefore it is not possible to know whether the test administrators' exercise of discretion in offering re-tests is a source of racial inequity in the hiring process. However, as discussed in detail below in Finding 2, the Pre-POWER test is a major driver of

inequitable outcomes in the hiring process overall.

In an attempt to mitigate the high rate of attrition at this stage in the process, CPD reported to OIG that it has made several changes in recent years to its communications with and support for candidates at the Pre-POWER test stage. These changes include:

- In 2016, CPD began offering multiple invitations to retake the Pre-POWER test.
- In 2016, CPD began providing promotional videos that include video clips of POWER testing.
- In 2016, CPD began accepting "POWER Cards," proof of off-site POWER testing at an eligible institution, for the Pre-POWER test hiring stage to accommodate scheduling.
- In 2017, CPD began offering free candidate conditioning classes to:
  - Provide space and opportunity for candidates to train in preparation for the physical assessment; and
  - Allow Department members to provide guidance on the form and technique required to pass all four test components.
- In 2017, CPD began sending reminder emails to candidates concerning their test date, time, and location.

CPD HR personnel informed OIG that some candidates have been invited to retake the Pre-POWER test up to four times.

- In 2017, CPD began providing a Frequently Asked Questions sheet with the testing invite that describes the components of the test.

The Background Investigation

For purposes of an investigative background check, candidates submit a completed Personal History Questionnaire (PHQ) and other required supporting documents.[26] The PHQ consists of ninety-four questions pertaining to the candidate's personal history. At the outset of the background investigation, candidates had one week to complete the questionnaire online at the time of this analysis. Candidates are not formally removed from consideration on the basis of their PHQ submissions, but answers provided on the PHQ do inform the research that CPD's vendor, Kentech, uses in the course of its background investigation in order to make a recommendation to CPD to pass or fail the candidate.[27] CPD may also decide to obtain more background information on a candidate through databases shared with CPD by other police departments.[28] Thus, answers given in the PHQ can effectively end a candidate's viability, even if candidates are not formally removed from consideration due to the PHQ alone.

The information requested on the PHQ includes:

- Biographical information
- Marital status
- Citizenship
- Education history
- Identification of immediate family members
- Residential history since age 13, including roommates

- References
- Employment history
- Criminal background
- Drug usage
- Driving history

In 2019, DHR conducted a survey of PO applicants between 2017 and 2019 who did not complete a PHQ. Of the 666 candidates surveyed, 23% responded. The survey results indicated that candidates' perceptions of poor communication between CPD members and the candidates, as well as work, family, and school obligations, accounted for a large percentage of candidates

[26] Other required documents include: Birth Certificate (for U.S.-born citizens), Certificate of Naturalization (for naturalized citizens), or Permanent Resident Card ("Green Card," for resident non-U.S. citizens); records of the candidate's driving history; proof of residency documents; any bankruptcy filings; and other personally identifying records.
[11] Kentech can search court databases, but searches in CPD's Citizen Law Enforcement Analysis and Reporting (CLEAR) database are conducted by CPD personnel.
[2S] CPD may utilize databases such as CLEAR and the Law Enforcement Agencies Data System (LEADS) in order to conduct more expansive employment checks, to check for candidate known aliases, to identify incidents that took place in another state, or to conduct background checks on family members or those that live with a candidate. CLEAR and LEADS are multi-function databases; LEADS is a statewide system provided by the Illinois State Police.

not completing the PHQ. Other respondents simply forgot or misplaced information necessary to complete the PHQ. The survey also asked candidates for feedback on improvements to the PHQ component of the hiring process. This feedback included allowing candidates more time to complete the PHQ, sending reminders to candidates to complete the PHQ, and allowing candidates to apply previous PHQ responses to subsequent PO applications.

In the course of the background investigation, candidates must submit to a home visit by background investigators. Kentech also interviews neighbors to obtain additional information on the candidate and runs background checks on all of the candidate's household members. This practice may be reflective of CPD's policy that sworn personnel may not "fraternize with any person known to have been convicted of any felony or misdemeanor," but evidence of such "fraternization" is not explicitly specified as a basis for disqualification for prospective POs.[29] Additionally, the PHQ asks candidates to provide identifying information about parents, siblings, step-siblings, and half siblings, and CPD may scrutinize the criminal history of family and close associates identified in the candidate's responses. These practices have the potential to be inequitably disqualifying, particularly since applicants are not made aware of what circumstances in their family and associates' backgrounds could be disqualifying, according to information provided to prospective applicants on CPD's website in a document titled, "Background Investigation for Prospective Applicants."[30]

According to CPD's website, PO applicants may be disqualified on the basis of a number of other conditions as well, including but not limited to:

1. Criminal conduct: Applicants will be disqualified from consideration for a police officer position if there is evidence that the applicant has engaged in certain criminal conduct, even if the applicant was never convicted

of a criminal offense:

a. Conduct involving a felony
b. Conduct involving drugs: criminally selling, delivering, receiving, possessing, or using any controlled substance

[29] CPD's Rule 47 prohibits CPD members from "associating or fraternizing with any person known to have been convicted of any felony or misdemeanor, either State or Federal, excluding traffic and municipal ordinance violations." The document "Background Investigation for Prospective Candidates" outlined on CPD's website differs slightly, stating applicants may be disqualified "if there is evidence that the applicant has engaged in criminal conduct, even if the applicant was never convicted of a criminal offense" or if they are "a member or affiliate of any criminal organization." While the disqualifying requirements for candidates do not explicitly prohibit fraternization with convicted felons, they do allow for disqualification based on "conduct that exhibits a pattern of repeated abuse of authority, lack of respect for authority or law or lack of respect for dignity and rights." Chicago Police Department, "Rules and regulations of the Chicago Police Department," Rule 47, April 16, 2015, accessed March 4, 2021, <http://directives.chicagopolice.orR/directives/data/a7a57bf0-12d7cl86-a4912-d7cl-8bl2822c2cal06c4.html>.

[30] CPD's website includes an outline of how a candidate's personal criminal history may be disqualifying, but it does not give a specific statement as to what in the candidate's family or close associates' criminal histories would be disqualifying other than in establishing association to a criminal organization. Chicago Police Department, "Background investigation for prospective applicants," accessed April 23, 2021, https.//home.chicagopolice.org/wp- <https://https.//home.chicagopolice.org/wp->content/uploads/Background-Investiga tion-For-Prospective-Applicants.pdf.

c. Conduct indicating dishonesty: conduct demonstrating a reputation or propensity for dishonesty
d. Conduct indicating violent tendencies
e. Conduct involving the unlawful use of weapons
f. Conduct affecting government functions: including treason, interference with public officers, interference with penal institutions, interference with judicial procedure, and official misconduct

2. Driving record
3. Prior employment history
4. Military history[31]
5. Membership or association with criminal organizations
6. Indebtedness
7. False statements or omissions/failure to cooperate in application process
8. Insufficient contacts with the United States
9. Polygraph results[32]
10. Other conduct[33]

The disqualifying conditions summarized on CPD's website are detailed further in the Bureau of Organizational Development's Special Order 18-01, "Pre-Employment Disqualification Standards for Applicants for the Position of Police Officer." This Special Order is not publicly available; CPD takes the position that it contains confidential operational information.

After the candidate has provided the required documents and has completed the background investigative stage, the background investigator will make a recommendation to CPD/OPSA HR to "pass" or "fail" the candidate. The background investigator prepares a report summarizing the findings of each candidate's background report.

4. CPD'S PREPARATORY OFFERINGS

CPD offers preparation sessions for the standardized exam (CPOE) and the physical fitness test (POWER test). Once candidates successfully complete an application, CPD invites them to participate in free preparation sessions. CPD began offering these sessions in 2017 at City Colleges of Chicago campuses and at CPD headquarters. For the POWER test, CPD began offering

[31] "An applicant who has received a Dishonorable Discharge or Bad Conduct Discharge will be found unsuitable for employment. An applicant who has received a discharge with other characterizations may be found unsuitable for employment based on the nature of the underlying offense." Chicago Police Department, "Background investigation for prospective applicants," accessed April 23, 2021, <https://home.chicaROpolice.org/wp-content/uploads/>Background-Investigation-For-Prospective-Applicants.pdf.
[32] The polygraph exam is a distinct step in the hiring process for which the results come into consideration in the assessment of the candidate during the background investigation. Polygraph results alone, without further evidence produced through the investigative background check, will not disqualify a candidate.
[33] "Any applicant who has engaged in conduct that exhibits a pattern of repeated abuse of authority, lack of respect for authority or law or lack of respect for dignity and rights may be found unsuitable for employment." Chicago Police Department, "Background investigation for prospective applicants," accessed April 23, 2021, <https://>home.chicaRopolice.orR/wp-content/uploads/BackRround-Investigation-For-Prospective-Applicants pdf.

free conditioning classes to applicants in 2016 as way to provide a space for candidates to train and to receive guidance on the form and technique needed to pass the fitness test components.

5. DISQUALIFIED CANDIDATE APPEALS

Candidates who are disqualified in the PO hiring process are eligible to appeal if their disqualification occurs in either the background investigation or the psychological examination stage. During the period of analysis, a candidate disqualified as a result of the background investigation could request a hearing before the City of Chicago Human Resources Board, which would determine whether to return the candidate to the eligibility list.[34] An interim appeals process for those disqualified by the psychological examination was instituted in 2017. On appeal, the candidate will be evaluated by one of two psychological examination vendors retained by CPD-whichever vendor did not conduct the first evaluation-and will be reinstated if the results of the second exam are favorable.[35] Applicants who fail at any other stage, such as either POWER test, may apply to a new PO posting in the future. While no candidate is prohibited from applying again, those who are eliminated because of some immutable characteristic on their record-for example, a disqualifying past criminal offense-will not succeed in a repeated application. See Appendix B for more information on appeals and reinstatements.

[34] In November 2019, Chapter 2-84 of the Municipal Code of Chicago was amended to grant the Police Board the power to consider appeals by PO applicants who have been removed from CPD's eligibility list due to the results of a background examination. This provision took effect in July 2020.
[35] The two vendors retained by CPD to conduct psychological examinations are the Chicago-based Center for Applied Psychology and Forensic Studies and California-based Law Enforcement Psychological Services, Inc.

III. OBJECTIVES, SCOPE, AND METHODOLOGY

OBJECTIVES

The objectives of this evaluation were to determine the demographic composition of the initial applicant pool for the position of Chicago Police Department (CPD) Police Officer (PO) and assess how CPD's hiring process impacts that demographic composition of the hiring pool, and the quality and susceptibility to analysis of the hiring data collected by CPD. These objectives entailed determining:

- Whether attrition at certain stages of the hiring process substantially impacts the diversity of the candidate pool;
- Whether there are demographic trends in the attrition of the hiring process overall;
- Whether unique individual applicants can be tracked through the hiring process;
- The race, gender, preference status, and neighborhood of residence for Academy entrants; and
- The average time it takes candidates to successfully complete the PO hiring process.

SCOPE

OIG evaluated all applications created on Taleo, the City's recruitment management system, from 2016 to 2018. For each distinct stage in the hiring process, OIG determined the volume and rate of attrition, the volume and the rate of no-shows, and the volume and rate of successful stage completions, both overall and by race and gender.[36] OIG also evaluated the demographic characteristics of the initial applicant pool and attrition for each hiring stage to determine whether they

equitably impacted candidates throughout the process.

While OIG examined the equity of CPD's hiring process, this analysis did not define what CPD's diversity benchmarks should be, nor did it measure whether CPD achieved its own goals for diversity in hiring, to the limited extent that it has articulated those goals. OIG did not evaluate reasons for candidate no-shows, voluntary withdrawals, failures, or disqualifications.

CPD and the Department of Human Resources (DHR) do not assign a unique identifier to every applicant who begins the application process, and some applicants begin the PO application process multiple times. Others may fail a given stage, file an appeal, and be reinstated in the

[36] OIG recognizes the distinction between sex classification and gender identity, and relies upon the categories in which CPD collects its data throughout this analysis. On data collection forms, CPD and the City ask candidates to identify their "Gender" and provide options of "Male" and "Female." Likewise, OIG recognizes the distinction between race and ethnicity. CPD collects data on candidate race/ethnicity differently at certain stages of the PO hiring process. In some stages, candidates are asked whether they identify as ethnically Hispanic or not and are asked separately about their racial self-identification. In other stages, candidates are asked to give their racial self-identification, with "Hispanic" as an option, and are not. asked separately about their ethnic self-identification. See Figure 24 below for more details. Recommendations associated with Finding 5 below propose that CPD and the City correct the sex/gender inconsistencies on their data collection forms, as relates to both sex/gender and race/ethnicity.

applicant pool. Because CPD and DHR do not assign unique identifiers to applicants, it was not possible for OIG to definitively identify multiple applications that may have originated from the same individual or match reinstated applicants to their original application. Because of this limitation, OIG is unable to determine the race and gender composition of unique individual candidates from the initial application pool, and instead uses aggregate counts of applications grouped by demographic information throughout the hiring stages. These complications with the data placed some limitations on OIG's analysis, as detailed in the Findings section below.

C. METHODOLOGY

To assess the diversity of the applicant pool and the demographic impact of CPD's PO hiring process, OIG evaluated:[37]

- Aggregate data on race and gender of initial applicants, from DHR
- Aggregate data on race and gender of candidate attrition by each hiring stage
- Chicago Police Officer Exam (CPOE) test administration data
- CPD materials used in the hiring process such as forms and questionnaires
- Results from a DHR survey of the Peace Officer Wellness Evaluation Report test no-shows
- Results from a DHR survey of candidates who did not return a Personal History Questionnaire
- Individually-identified data on Academy entrants and those who successfully complete the probationary period

Additionally, OIG conducted interviews with:

- Personnel from CPD Bureau of Organizational Development
- Personnel from CPD Education and Training Division

- Personnel from CPD HR[38] '
- Personnel from DHR
- Chairperson of the City of Chicago Human Resources Board

[37] OIG reviewed an analysis on the PO hiring process which the University of Chicago Crime Lab produced for CPD. Like OIG's report, the Crime Lab examines demographic differences in attrition in the PO hiring process. However, the Crime Lab analysis is more limited than OIG's, and as a result, equity impact conclusions from the two reports do not necessarily align: (1) The Crime Lab analyzed the December 2018 test administration only, whereas OIG analyzed five test administrations from April 2016 through December 2018; (2) OIG's analysis covers the entire hiring process, beginning earlier and extending further than the Crime Lab's analysis, which begins after the CPOE exam, thus not including the application/payment stage and the CPOE stage, and ends prior to the Academy, thus not including the Academy and probationary period analyzed in this report; and (3) The Crime Lab analysis does not assess the impact of appeals or reinstatements where possible (background investigation and psychological test). OIG reviewed data on psychological test appeals and reinstatements but not on background investigation appeals and reinstatements, due to data quality issues. (See Appendix B, Appeals and Reinstatements for more detail). [33] During the period of analysis,.the CPD-specific HR function was housed within CPD As noted above in the introduction, that function has now moved to OPSA.

STANDARDS

OIG conducted this review in accordance with the Quality Standards for Inspections, Evaluations, and Reviews by Offices of Inspector General found in the Association of Inspectors General's Principles and Standards for Offices of Inspector General (i.e., "The Green Book").

AUTHORITY AND ROLE

The authority to perform this inquiry is established in the City of Chicago Municipal Code § § 2-56-030 and -230, which confer on OIG the power and duty to review the programs of City government in order to identify any inefficiencies, waste, and potential for misconduct, and to promote economy, efficiency, effectiveness, and integrity in the administration of City programs and operations, and, specifically, to review the operations of CPD and Chicago's police accountability agencies. The role of OIG is to review City operations and make recommendations for improvement. City management is responsible for establishing and maintaining processes to ensure that City programs operate economically, efficiently, effectively, and with integrity. Further, Paragraph 561 of the consent decree entered in Illinois v. Chicago requires OIG's Public Safety section to "review CPD actions for potential bias, including racial bias."[39]

[39] Consent Decree H 156, State of III. V. City of Chi., No. 17-cv-6260 (N D. III. Jan. 31, 2019) (Dkt. 703-1).

IV. FINDINGS AND RECOMMENDATIONS

FINDING 1: THE DEMOGRAPHIC MAKEUP OF HIRED POLICE OFFICERS SUBSTANTIALLY DIFFERS FROM THE INITIAL APPLICANT POOL^PRIMARI%DJJE TO THE DECREASE IN BLACK CANDIDATE ■ REPRESENTATION L > *

In analyzing the demographic information of candidates for the role of Chicago Police Department (CPD) Police Officer (PO), OIG found that the racial makeup of the initial applicant pool changed substantially from the beginning to the end of the hiring process, primarily driven by the loss of Black candidates. OIG evaluated applications submitted from 2016 to 2018 and found that of the applicants with a reported race on their applications, Black candidates comprised 37% of the initial pool, but just 18% of those invited to the Academy; over the same time period, Asian, Hispanic, and White candidates increased in their proportional representation in the pool from application to Academy (Figure 5 below).[40] Additionally, OIG found a measurable decrease in female representation throughout the hiring process with female candidates comprising 34% of applications with a reported gender but just 27% of Academy recruits.[41]

'so 5 3% of all recruits who entered the Academy in the period of analysis dropped out during Academy training or during the probationary period after Academy graduation. Attrition at these two final stages of the hiring process slightly increased the relative representation of Black candidates among POs because Black recruits are relatively less likely to drop out from these final stages than non-Black recruits: 3.2% of Black recruits drop out in the Academy or probationary period, versus 6.1% of Asian recruits, 5.2% of Hispanic recruits, and 6.4% of White recruits. '-1 Once candidates are invited to attend the Academy, CPD ceases to refer to them as "candidates" and refers to them instead as "recruits." OIG follows that convention in this evaluation.

CPD Initial Application	Referred to DHR for Invitation to Academy

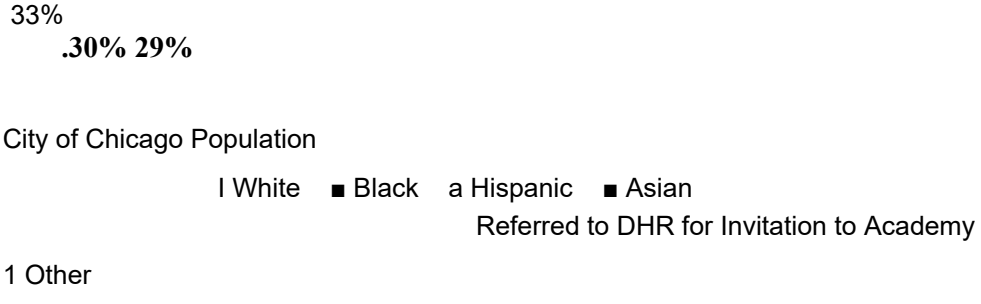
Source: OIG analysis.

CPD recruits and PO hires do not reflect the racial diversity of Chicago, despite a high initial application rate for Black candidates. While CPD has not publicly articulated clear benchmarks for diversity in hiring, and OIG does not comment on what CPD's benchmarks should be, this evaluation assessed broad demographic categories at several points in the hiring process compared to the Chicago population. During the period of analysis, relative to the Chicago population, the pool of applicants invited to the CPD Academy substantially underrepresented Black candidates and slightly underrepresented Asian candidates, while White and Hispanic candidates were represented at or above their proportion of the city population (Figure 6 below). Female candidates were also substantially underrepresented among those invited to the Academy (27%) compared to their proportion of the city population (51%).[42]

While the low representation of female Academy recruits is attributable in significant part to low female representation in the initial applicant pool, the same cannot be said for the low representation of Black recruits. As seen above in Figure 5, Black candidates made up the largest racial/ethnic group of initial applications, yet were the only group to see such a substantial drop in representation (nearly 19%) by the end of the hiring process.

'1? U.S. Census Bureau, "Quick Facts," accessed March 4, 2021, <https://www.census.gov/quickfacts/>chicagocityillinois.

FIGURE 6: RACIAL/ETHNIC MAKEUP OF THE POPULATION OF CHICAGO COMPARED TO CANDIDATE POOL THROUGHOUT THE HIRING PROCESS



Source: OIG analysis.

RECOMMENDATION

1. CPD should clarify its stated goal of "look[ing] for candidates that reflect our communities' broad cross-sections" by specifying benchmarks for diversity in hiring.

MANAGEMENT RESPONSE

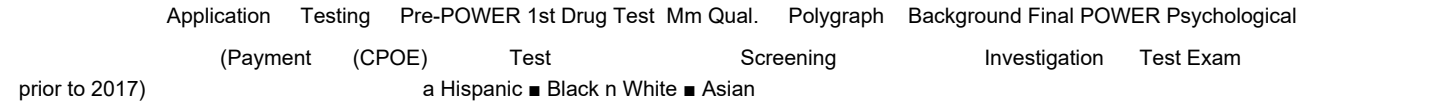
1. *CPD and the City have engaged a consultant for Consent Decree work for Recruitment Hiring and Promotions that will address this recommendation. In collaboration with DOL, DHR, CPD, and OPSA HR, the consultant will develop a framework, best practices, and benchmarking. CPD and the City are in the initial phases of gathering and sharing information, but the consultant will not fully begin work until January 1, 2022, which is when budgeted funds will be available. OPSA HR is in the process of coordinating with the consultant to identify deliverables that the consultant will provide.*

FINDING 2: SEVERAL HIRING STAGES HAVE DISPROPORTIONATELY HIGH ATTRITION RATES FOR BLACK AND FEMALiCANDIDATES : ' 1 "

OIG evaluated the total attrition, that is, the percent of the remaining pool that was eliminated for any reason (e.g., failed, did not show, or withdrew), at each stage in the year-and-a-half long PO hiring process. This analysis found that the Chicago Police Officer Exam (CPOE), the first Peace Officer Wellness Evaluation Report (POWER) test, and the background investigation stages had higher attrition rates for Black candidates than for those of other race groups, and that the first Pre-POWER test had higher attrition for female candidates compared to male candidates (Figure 7).

FIGURE 7: TOTAL ATTRITION RATES FOR EACH STAGE IN THE HIRING PROCESS BY RACE/ETHNICITY AND GENDER

Male



Stages with little to no attrition are not shown (i.e., police screening, second drug test, medical exam, second minimum qualification screening, review of required documentation, and indebtedness check).

Source. OIG analysis.

While lower in overall attrition, the application/payment stage[43] and first drug test also had higher attrition rates for Black candidates compared to other race groups, and the minimum qualification screening appeared to retain White candidates at a higher rate than candidates of other races/ethnicities, except for Asian male candidates.

A. DIFFERING ATTRITION RATES CHANGE THE DEMOGRAPHIC MAKEUP OF THE CANDIDATE POOL THROUGHOUT THE HIRING PROCESS

As noted above in Finding 1, CPD's initial applicant pool had a markedly different demographic makeup than the pool that was ultimately hired. As shown in Figure 8 below, Black candidates saw the sharpest reduction in representation in the pool from the application stage to invitation to Academy (36.9% to 18.0%), while White candidates saw the largest growth in their representation in

the pool (22.1% to 34.1%). When accounting for race by gender, Black female candidates were the demographic group with the sharpest reduction in their representation in the pool from initial application to invitation to Academy (Figure 9).

FIGURE 8': DIFFERENCE IN RACIAL/ETHNIC GROUP PERCENTAGE OF CANDIDATE POOL FROM INITIAL APPLICATION TO INVITATION TO ACADEMY

Percentage of Pool at ;>. Initial Application

■ Percentage of Pool .. Invited to Academy

American Indian

+1.3%

-18:9%

Hawaiian Pacific Islander

Hispanic

Two or More Races

+12.0%

Source: OIG analysis.

Percentage of Pool Invited to Academy
Difference

FIGURE 9: DIFFERENCE IN BLACK MALE AND BLACK FEMALE MAKEUP OF CANDIDATE POOL FROM INITIAL APPLICATION TO INVITATION TO ACADEMY

Percentage of Pool at Initial Application '

Black Female

Black Male

Source: OIG analysis.

[1,3] The $30 payment was discontinued after the April 2016 CPOE administration, and is included in this evaluation. Despite eliminating the payment, DHR's records have retained this stage and reported to OIG that the continued use of "No Payment" as an elimination reason indicates applicants with incomplete applications.

While all Black candidates had disproportionately high attrition rates compared to other race groups in the CPOE, Pre-POWER test, and background investigation, these stages impacted the Black male and Black female makeup of the candidate pool differently. As Figure 10 below shows, the proportion of the pool comprised of Black male candidates saw its sharpest drops in the CPOE and background investigation stages. Meanwhile, the proportion of the pool comprised of Black female candidates dropped most sharply in the CPOE and the Pre-POWER test stage (Figure 11).

Source: OIG analysis.

FIGURE 10: RACIAL/ETHNIC COMPOSITION OF MALE CANDIDATES THROUGHOUT THE HIRING PROCESS

OIG FILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

FIGURE 11: RACIAL/ETHNIC COMPOSITION OF FEMALE CANDIDATES THROUGHOUT THE HIRING PROCESS

18%

Source: OIG analysis.

Notably, CPD has reported a backlog in completing summary reports of background investigations for candidates removed from eligibility on the basis of information gathered during that phase. Candidates that are removed due to the background investigation cannot file an appeal of their removal until the background summary report has been completed, so the backlog affects the timing and rate at which candidates can appeal their removal. By narrowing-or in some cases eliminating-avenues for appeal, and where the background investigation is a stage which sees disproportionate attrition of certain groups of candidates, this condition risks exacerbating inequitable impact. CPD has reported that candidates who age past the maximum permitted starting age of 40 years while awaiting their summary reports are removed from consideration and no longer processed for appeal. There are no guidelines or internal operating procedures that dictate how long CPD has to complete a background summary report.

The disproportionately high attrition of Black candidates at the CPOE exam, the Pre-POWER test (which also sees disproportionately high attrition for female candidates of all races), and the background investigation are the three stages of the hiring process that raise equity concerns most acutely. Additional stages of concern include the application/payment, the first drug test, and the minimum qualification screening. These stages are therefore the focus of the remaining analysis in this Finding.

B. HIGH NO-SHOW RATES AND FAILURE RATES IN THE CPOE AND PRE-POWER TEST STAGES DRIVE DISPROPORTIONATE ATTRITION RATES FOR BLACK AND FEMALE CANDIDATES

OIG measured the no-show rate of candidates at each stage-that is, from among the total remaining candidates, the percent of candidates who did not appear at each stage. OIG found that no-show was the main cause of attrition in the CPOE and Pre-POWER test stages, two of the largest attrition points in the PO hiring process, as shown below in Figure 12.

FIGURE 12: RATE OF TOTAL (ALL RACES AND GENDERS) ATTRITION AND NO-SHOWS FOR EACH STAGE IN THE PO HIRING PROCESS

51%
61%
0%0%
|o% 1%
18%

I Attrition Rate I No Show Rate

Application/Payment Testing (CPOE) Police Screening |

I% First POWER Test [Drug Test 1 Min. Qual. Screening

Polygraph Background Investigation Final POWER Test

Drug Test 2 Medical Exam Psychological Exam Final

Min. Qual. Screening | 0% Review Req. Docs | 0%

Indebtedness Check I 0%

Administrative stages where it is not possible for a candidate to "no-show" are shown here with only the attrition rate for the stage.

Source: OIG analysis.

Additionally, OIG compared no-show rates by candidates' demographic information and found that all candidates, regardless of race or gender, had their highest rates of no-show in the CPOE and Pre-POWER test stages. However, for the CPOE stage, Black male and Black female candidates had higher rates of no-shows compared to candidates of other race groups. Specifically, 45% of Black male and 50% of Black female candidates did not show for the exam compared to 37% of White male and 36% of White female candidates (Figure 13 below).

For the first Pre-POWER test, female candidates of all races had higher no-show rates than their male counterparts, except White female candidates who had no-show rates similar to White

male candidates. Hispanic female candidates had a 5% higher no-show rate, Black female candidates 8% higher, and Asian female candidates 9% higher than their male counterparts in the Pre-POWER test stage (Figure 13 below).[44]

FIGURE 13: PERCENT OF REMAINING CANDIDATES WHO WERE NO-SHOWS FOR THE CPOE AND PRE-POWER TEST, BY RACE/ETHNICITY AND GENDER



Source: OIG analysis.

As the main cause for attrition at two critical points in the PO hiring process, reducing no-shows could be an effective remedy to the inequitable impact of CPD's hiring process on Black and female candidates, and could strengthen the quality of the hiring pool overall.

In addition to no-shows, another way that candidates can be eliminated in these stages is to fail the CPOE or fail to meet the physical standards in the Pre-POWER test. Figure 14 below shows the rates of failure, or the percent of candidates who took the CPOE or Pre-POWER test and failed, by race and gender.[45] Similar to no-shows, Black male and Black female candidates had disproportionately high failure rates for the CPOE compared to candidates of other race/ethnicity groups. Further, female candidates failed the Pre-POWER test at higher rates than male candidates of the same race/ethnicity, with the exception of Asian female candidates. Moreover, nearly half (49%) of Black female candidates who took the Pre-POWER test failed, higher than any other demographic group. Hispanic females had the second highest Pre-POWER test failure rate at 37%.

[44] In 2017, DHR administered a survey to candidates who sat for the CPOE but did not complete the Pre-POWER test. That survey was sent to 2,597 no-show candidates, and 922 (36%) of them returned responses. When asked why they were no-shows for the Pre-POWER test, 31.4% of respondents reported that they did not feel prepared to pass the test and 30.9% had a pre-scheduled conflict. Nevertheless, both male and female candidates (96% and 97.5%, respectively) expressed willingness to participate in the Pre-POWER test if invited again in the future. Respondents indicated that more information on preparation session (33%) and improving the test scheduling process (48%) would improve their likelihood of showing up in the future.

[45] OIG defines test-takers as candidates who were not eliminated in a previous stage and were not listed as no-shows within the stage. Candidates with unknown attrition reasons, or something other than "No-Show" or "Failure" were excluded from the analysis.

Male Female Male Female

Testing (CPOE) Pre-POWER Test

B Hispanic ■ Black ■ White ■ Asian

Source: OIG analysis.

C. THE CITY'S ELIMINATION OF THE CPOE PAYMENT REQUIREMENT AND CPD'S LAUNCH OF CPOE PREPARATION SESSIONS CORRELATED WITH AN INCREASE IN EXAM TURNOUT FOR BLACK APPLICANTS BUT DID NOT IMPROVE THE DISPROPORTIONATE FAILURE RATE

The City of Chicago previously required a $30 payment for candidates to sit for the CPOE, hosting the last test requiring a payment in April 2016. OIG evaluated this test administration and the four following tests, for which no payment was required. OIG found that eliminating the test payment was associated with a small increase in the percentage of the total initial applicant pool that progressed beyond the CPOE stage in the hiring process. This percentage rose from 34.1% in April 2016 to an average of 36.0% of applicants in the four subsequent test administrations where no payment was required (column 4 in Figure 15).

It appears that the increase in candidates who advanced past the CPOE stage was driven by an increase in the rate of applicants who sat for the exam.'[16] The percentage of all applicants who sat for the CPOE increased by an average of 2.4% after the payment requirement was eliminated

"" OIG defines candidates who turned out for the exam (test-takers) as candidates that were not eliminated in the application/payment stage prior to the CPOE stage and not listed as no-shows within the CPOE stage. In the April 2016 CPOE administration, 3,135 candidates (11.9% of the initial applicant pool) had an attrition reason in the CPOE stage that was something other than "No-Show," "Failure," or "Unknown". The other test administrations all had 1% or less of the applicant pool with an unknown attrition status in the CPOE stage. For all tests, these candidates are excluded from the counts of those considered to have taken the exam, since OIG was unable to venfy whether they sat for the exam

(column 5 in Figure 15).[47] In the same time period, CPD began offering free test preparation sessions, which may also account for some of the increase in test turnout. However, the overall failure rate on the CPOE remained consistent (column 6 in Figure 15). The relatively steady failure rate for the exam suggests that these preparation sessions did not impact candidate performance on the exam, despite potentially improving test turnout.

FIGURE 15: OVERALL STAGE SUCCESS, CPOE TURNOUT, AND FAILURE RATES ACROSS TEST ADMINISTRATIONS

Payment Required?

Prep Sessions **Percentage of All Applicants That**

Offered? Progressed Past CPOE

CPOE Turnout for All Applicants
CPOE Failure Rate for Those Who Took Exam"

:CNq¡ , , | 34.1%
Apr-17 [1] j No:
May-18
Dec-17 1 . <r:.:t^t:-PMMnm--K
iiiiJ
No;'"
Yes".
*No'.*ʸ«? %¡- * i*
Dec-18

Source: OIG analysis.

CPOE turnout improved for the applicant pool at large after the elimination of the payment requirement, but this change was driven mainly by the increase in CPOE turnout for Black applicants. Black applicant turnout increased by an average of 7.3% and turnout for non-Black applicants increased by an average of 1.4% (columns 4 and 5 in Figure 16 below). The elimination of the payment requirement appears to have contributed to a narrowing of the gap in test turnout between Black and non-Black applicants (column 6 in Figure 16).

FIGURE 16: CPOE TURNOUT FOR BLACK AND NON-BLACK APPLICANTS

■■ ' " ' S1|^K-V ' ■ ' ' ■ -. ~v Date:^.Required?	,-r,«r -r . t . r ^¡^'^ D fference in CPOE CPOE ■■ • ■ Prep Exam "Payment „ Turnout CPOE Turnout for All . _ ^, „. . , . ■ :■;-■/„. . ... Sessions .. ■ .■ :-=m--Turnout for Black vs. for All Black Non-Black „. . . .. ■ ... '.kvi: : - Non -Black Applicants Applicants .. - ^ ■ Applicants		
Apr-16 • Yes ' '"'^No/: •	32.83%	40.94%	-8.11%
Apr-17 '■ '. No ';^:f%r*Y.et	42.94%	43.95%	-1.01%
Dec-17 :" No'...'!>;V"'v^ Ye^:;':·!\	40.66%	41.44%	-0.77%
May-18 \ No •• ,.. Yes' "	39.21%	41.75%	-2.54%
Dec-18 : ' No:;-';	37.92%	42.38%	-4.46%

Source: OIG analysis.

[47] When the payment was required, 45.9% of the initial pool was eliminated in the application/payment stage and the no-show rate for the CPOE was just 6.9%. When the payment was eliminated, the candidate attrition rate at the application stage dropped to an average of 18.6%, but the CPOE no-show rate rose to an average of 48.7%. The evidence suggests that some applicants who were likely to quit the process prior to the CPOE may have shifted which stage they did so in, with the elimination of the payment requirement-terminating in the application stage when payment was required, then terminating as CPOE no-shows when the payment requirement was removed.

Despite increased test turnout, Black candidates' proportion of the applicant pool still declined between the initial application and CPOE exam stages. However, the decline became less severe after the payment requirement was eliminated and test turnout for Black applicants increased (Figure 17).

FIGURE 17: CHANGE IN RACIAL/ETHNIC MAKEUP OF POOL FROM INITIAL APPLICATION TO AFTER

THE CPOE STAGE, WITH AND WITHOUT PAYMENT

Payment Eliminated

Black, 30.6% Hispanic, 28.7%

White, 17.8%

Asian, 2.0%

42.0%

25.7% 23.0%

Hispanic, 30.7% Black, 30.6%

White, 18.7%

Asian, 2.3%

Percentage of Total Applicants

Source: OIG analysis.

Percentage of Pool Remaining After CPOE

Percentage of Total Applicants

Percentage of Pool Remaining After CPOE

One explanation of the persisting impact of the CPOE stage on the Black proportion of the candidate pool is that the failure rate of Black candidates remained disproportionally higher (on average 2.9x higher) than that of non-Black candidates (column 6 in Figure 18). The evidence indicates that the City's elimination of the CPOE payment requirement and CPD's introduction of CPOE preparation sessions may have mitigated the decrease in Black representation that occurs at the CPOE stage by improving test turnout without entirely eliminating it. The persistently high failure rate for Black candidates means that the Black proportion of the candidate pool is still lower after the CPOE stage than it is at the outset.

FIGURE 18: CPOE FAILURE RATE FOR BLACK AND NON-BLACK TEST-TAKERS ACROSS TEST ADMINISTRATIONS

Payment Required?

' Prep CPOE Failure Rate;

' Sessions ; for All Black

. ᵥOffered?^I^^\Test-Takers ⁝:;:.^;

powered by Legistar™

"CPOE Failure Rate
for all i^INoh^Black Test-Takers
Ratio of Black CPOE: Failure Rate to Non-> s Black CPOE Failure *'*">',;. Fate
22.09%
24.05%
21.96%
May-18 ' y,..;No
18 86%
Source: OIG analysis.

D. FEWER APPLICATIONS AND HIGHER ATTRITION RATES CONTRIBUTE TO THE LOW REPRESENTATION OF FEMALE RECRUITS

As described in Finding 1, there is a gender imbalance in the pool of recruits invited to CPD's Academy. OIG found that female candidates completed fewer applications than male candidates at the start of the PO hiring process, comprising 34% of the initial pool. Further, female applicants became less represented over the course of the hiring process, eventually comprising just 27% the recruits referred to DHR for invitation to the Academy (Figure 19 below). The CPOE and Pre-POWER test were the stages that most significantly decreased the female candidate pool, with the Pre-POWER test accounting for the largest decrease in female representation.

FIGURE 19: FEMALE PROPORTION OF CANDIDATE POOL THROUGHOUT THE HIRING PROCESS

Source: OIG analysis.

The change in the female proportion of the candidate pool at large mirrors that of Black female candidates, who also saw their two biggest drops in representation in the CPOE and Pre-POWER test (see again Figure 10). The close correlation between the attrition trends for female candidates overall and Black female candidates is driven by the fact that Black female candidates comprised just over half (50.2%) of all female applications for the test administrations in scope for this analysis. The other major demographic groups of female applicants were Hispanic (30.7%), White (13.0%), and Asian (1.1%).

Racial equity and gender equity in CPD's hiring pipeline are intersectional issues. Over the course of the hiring process, the relatively large pool of Black female applicants sees a steeper decline in their representation than any other female race group. If CPD can improve its retention of

female candidates of all races in its candidate pool, doing so would result in significantly improved retention of Black candidates. By the same logic, if CPD can improve its retention of Black candidates in its candidate pool, this should

improve the retention of female candidates.

RECOMMENDATIONS

2. CPD and OPSA HR should ensure that, as far as possible under applicable law, candidates are eliminated only on grounds relevant to their potential performance as POs by evaluating the following hiring process stages for bias and accuracy in predicting job performance:
    a. the format and content of the CPOE;
    b. the use of the Pre-POWER Test as a disqualifier;[48]
    c. the questions in the Personal History Questionnaire;
    d. the background investigation disqualifying conditions; and
    e. the minimum qualification conditions.[49]

3. CPD and OPSA HR should seek ways to shorten the length of the nearly year-and-a-half long PO hiring process, to avoid losing qualified applicants who are unable or unwilling to wait so long to secure a position.

4. CPD and OPSA HR should provide candidates more detail about disqualifying standards in the background investigations process, particularly around family members and acquaintances' personal and criminal histories.

5. CPD and OPSA HR should assess communication to candidates in advance of the CPOE and Pre-POWER test and should consider deploying targeted messaging to demographic groups with high attrition rates to encourage and enable candidates to show up on the test day.

6. CPD and OPSA HR should assess the equity of accessibility for test preparation sessions and materials for the CPOE and POWER tests and seek out additional ways to lower

[AS] The Illinois Law Enforcement Training and Standards Board (ILETSB) does not require that candidates pass a Pre-POWER test as a hiring requirement, only that recruits must pass a POWER test in order to begin training Academy coursework. Currently, CPD administers a Pre-POWER test in its hiring process to screen out candidates who will not meet the required physical standards before investing more resources in them. Additionally, according to the Illinois Admin. Code, these standards have not been updated since 1991. ILETSB, "Frequently Asked Questions (FAQ)," accessed March 4, 2021, <https://www.ptb.illinois.gov/resources/frequently-asked-questions-faq>; See III. Adm. Code, tit. 20, sec. 1720 appx. A, accessed March 4, 2021, <https://www.ilga.gov/commission/icar/admincode/020/>02001720ZZ9996AR.html.

[9] Similar to the POWER test standards which are set by an external authority, some minimum qualification standards are set by municipal ordinance or federal law:
MCC 2-152-050 requires employees of the City of Chicago to reside within city limits.
MCC 2-15-410(e) states that "no person above the age of 40 may receive initial appointment as a probationary career service police officer with the police department."

administrative hurdles for candidates, such as offering an online exam or make-up testing days for candidates who do not appear for the CPOE and/or Pre-POWER test.

7. CPD and OPSA HR should consider recruitment, outreach, and informational and training
■ sessions targeted to female applicants to help prepare them for the POWER tests.

8. CPD and OPSA HR should consider ways to improve CPOE and POWER test passing rates. For example, CPD might consider allowing applicants who nearly meet the expected standards in the Pre-POWER test to remain in the candidate pool, providing an opportunity for these candidates to prepare and pass the final POWER test.

MANAGEMENT RESPONSE

2. CPD and OPSA HR note that these recommendations are like those in Consent Decree paragraphs 258 and 259. CPD and OPSA HR are working in collaboration with DHR and DOL to achieve compliance with these paragraphs. Specifically:

2(a) - DHR, CPD, and OPSA HR regularly evaluate the format and content of the CPOE in accordance with the Uniform Guidelines on Employment Selection Procedures ("Uniform Guidelines"). The Uniform Guidelines provide employers with a framework for determining the proper use of tests and other selection methods. As part of the evaluation, DHR engages a vendor to conduct both a job analysis and a validation study to evaluate the job-relatedness of the CPOE. This process has been used for past administrations of the CPOE. We also note that we are currently going through this evaluation process again. 2(b) - CPD and OPSA HR continue to evaluate the Pre-POWER test as an accurate predictor of whether a candidate will be able to enter the Academy, as well as to avoid bias. Beginning July 2021, a candidate who does not successfully pass all components of the Pre-POWER test will no longer be automatically disqualified from continuing the application process. Instead, the Pre-POWER test will help inform a candidate as to their likelihood of completing the state-required POWER test, which a candidate must successfully pass before entering the Academy. We will inform and engage candidates to help prepare them for the state-required POWER test.

2(c) - CPD, and OPSA HR in consultation with DHR continue to review the PHQ to ensure that it avoids bias and accurately reflects a candidate's suitability for the role of police officer. Based on candidate feedback and review of processes, candidates are now being given additional time to complete the PHQ. 2(d) - CPD, and OPSA HR in consultation with DHR continue to review the background investigation disqualifying conditions to ensure that they avoid bias and accurately reflect a candidate's suitability for the role of police officer. 2(e) - CPD, and OPSA HR in consultation with DHR continue to review the minimum qualification conditions to ensure that they avoid bias and accurately reflect a candidate's suitability for the role of police officer.

3. *CPD and OPSA HR, in consultation with DHR, continue to evaluate the hiring process and look for ways to streamline. However, this is a common issue across law enforcement. The Evaluation highlight a "medium duration", but this does not reflect that applicants during the evaluation period (2016-2018) could take the CPOE at age 18 even though they were not eligible to enter the Academy until age 21. Since 2018, CPD and OPSA HR*

have taken substantial steps to shorten the hiring process, and now an applicant could enter the Academy in as little as 4-6 months after passing the CPOE. CPD and OPSA HR continue to look for ways to further shorten the hiring process while maintaining the high standards expected of police officers. The City has also worked to reduce the timeframe for which candidates receive their results after completing the CPOE.[50]

4. *CPD and OPSA HR will post more detail about the disqualifying standards in the background investigation process.*

5. *Since the end of the Evaluation period, CPD and OPSA HR have committed to do 8 "touches" with candidates between the time of application and administration of the CPOE. These touches come via email and text message, and include providing study guides, reminders, and offering physical training classes at the Academy. CPD and OPSA HR are working to provide applicants and candidates with a program that includes dietary suggestions, as well as physical training classes, including classes targeted specifically for female candidates. Additional preparation materials will also be added to the recruiting website. CPD and OPSA HR will continue to work with DHR and DOL to determine a legally appropriate way to deploy targeted messaging to demographic groups with high attrition rates.*

6. *Since the end of the evaluation period in 2018, OPSA HR has undertaken substantial steps to increase opportunities for applicants to take the CPOE. The CPOE test is being offered online in June 2021 on multiple days and at multiple times. Candidates can take the exam securely from their home or complete testing at many available testing centers across the region and nationally. There are also multiple dates and times for applicants to take the Pre-POWER test. CPD and OPSA HR will also accept the POWER card that an applicant may get at locations approved to administer the POWER test. Finally, OPSA HR is also looking to partner with different groups to hold POWER preparation and training sessions at various locations throughout the city.*

7. *As noted in response to recommendations 5 and 6, CPD and OPSA HR have already taken substantial steps to provide female applicants with access to informational and training sessions to help them prepare for the POWER test. CPD is currently working on updating its recruiting website with additional training information targeted toward female applicants and adding dietary information on the website as well. Finally, CPD and OPSA HR are partnering with law enforcement interest groups, including the Chicago Association of Women in Law Enforcement (CAWLE) to make further outreach to female*

[50] OIG reports on a median duration of 1.4 years, at Figure 3.

applicants, the National Organization of Blacks in Law Enforcement (NOBLE), the National Association of Black Law Enforcement Officers (NABLE), the National Association of Blacks in CriminalJustice (NABCJ), the Hispanic American Police Commanders Association (HAPCOA), and the Hispanic National Law Enforcement Association (HNLEA)[51]

8. *CPD and OPSA HR agree that they should consider ways to improve CPOE and POWER test passing rates, and, as noted above, have already taken substantial steps since 2018 to achieve this. Regarding the CPOE, the last 3*

rounds of test administration have seen an average pass rate of 94.7%, with African Americans passing at a rate of 88.6%. The City is working with the CPOE test developer to improve test utility while reducing group differences. Also as noted above, failing to pass the Pre-POWER test will no longer be an automatic basis to disqualify a candidate from further consideration. CPD and OPSA HR cannot make any adjustment to the state-required POWER test requirements, but, as noted above, will work with candidates on training and nutrition to assist with passing the POWER test.

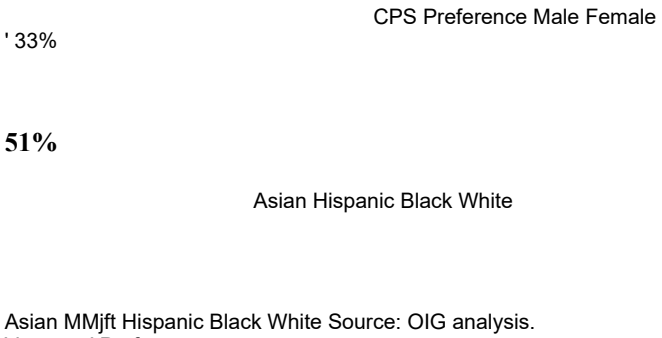
[51] NOBLE is the National Organization of Black Law Enforcement Executives. "National Organization of Black Law Enforcement Executives," accessed June 22, 2021, <https://noblenational.org/>. HAPCOA is the Hispanic American Police Command Officers Association "Hispanic American Police Commander Officers Association," accessed June 22, 2021, http.//hapcoa.org/ <http://http.//hapcoa.org/>.

VETERANS:>REFE® < RACIAL
DIVERSITj, ^
M AY: IN C R EAIs E TH E" GE N D E RIM B A NC E^^; ■ |fi|i

As described above, candidates may select a preference status while completing the PO application. If verified and granted, preference status allows qualified candidates to be considered before qualified candidates without preference

status, who are considered in lottery order.[52] OIG evaluated the preference status-Chicago Public Schools (CPS) preference, provided to applicants with verified graduation from a CPS high school, and veterans' preference, provided to veterans of the U.S. Armed Services-for those who entered the CPD Academy.[53]

FIGURE 20: PERCENT OF ACADEMY RECRUIT DEMOGRAPHIC GROUPS WITH CPS AND VETERANS' PREFERENCE STATUS



OIG found that 41% of all Academy recruits entered with CPS preference status. Non-White recruits had higher rates of CPS preference status than the Academy at large; including Black male (+10%), Black female (+24%), Hispanic male (+11%), Hispanic female (+15%), and Asian

[52] After DHR receives the list of candidates that passed the CPOE, DHR creates and randomizes a lottery list and refers candidates to CPD for further processing. The lottery results influence how quickly candidates are referred to CPD and therefore how quickly they are able to proceed through the remaining hiring process stages, but the lottery does not remove any candidates who passed the CPOE from consideration. " OIG did not analyze line of duty preference, as it is rarely claimed by PO candidates.

male recruits (+17%). Black female recruits had the highest rate of CPS preference of any demographic group at 65% (Figure 20 above). Further, the racial makeup of recruits with CPS preference tended to mirror the racial makeup of the CPS student body overall (Figure 21 below). However, the Black proportion of recruits with CPS preference was lower than the Black proportion of the CPS student body.[54] This gap in representation could have a number of explanations, from differing CPS graduation rates across demographic groups, to a potentially untapped pool of Black CPS graduates for CPD recruitment, to a discrepancy in the advertisement and knowledge of the preference system. The evidence suggests that CPS preference may be a useful tool for CPD to improve the racial diversity of recruits entering the Academy.

Additionally, OIG found that 11% of all Academy recruits entered with veterans' preference. The rate of veterans'

preference was higher for male candidates of all race groups than the Academy at large, including Asian male (+6%), Black male (+5%), Hispanic male (+3%) and White male recruits (+1%). However, female candidates of all races had lower rates of veterans' preference than the Academy at large, including Black female (-5%), Hispanic female (-7%), and White female recruits (-9%), and no veterans' preference was claimed by any Asian female recruits who made it to the Academy (Figure 20 above). This disparity is similar to that seen among enlisted members of the military, although the female proportion of CPD recruits with veterans' preference is even less than the female proportion of the U.S. military (Figure 21 below).[55] This discrepancy may contribute to CPD's gender imbalance in hiring.

[M] Chicago Public Schools, "Stats and Facts," accessed March 4, 2021, <https://www.cps.edu/about/stats-facts/>

The U.S. Department of Defense only reported the female proportion and did not report the male proportion specifically nor other gender classifications such as transgender. The male proportion reported here is the non-female proportion for the U.S. military. For Academy recruits, it is those who identified as male. U.S. Department of Defense, "Population representation in the military services (2017)," accessed March 4, 2021, httpsV/prhome. defense.gov/Portals/52/Documents/MRA <http://defense.gov/Portals/52/Documents/MRA> Docs/MPP/AP/poprep/2017/Executive% 20Summary.pdf.

FIGURE 21: RACIAL/ETHNIC MAKEUP OF RECRUITS WITH CPS PREFERENCE COMPARED TO CPS STUDENT BODY AND GENDER MAKEUP OF RECRUITS WITH VETERANS' PREFERENCE COMPARED TO U.S. MILITARY

Source: OIG analysis.

What may be inferred from the available data on the candidate preference system is limited in a critical way; since CPD and DHR do not assign unique identifiers for all applicants in the hiring process, demographic data and preference status can only be tied to unique applicants at the Academy stage, where they are placed on the City's payroll and their information is entered into the Chicago Integrated Personnel and Payroll Systems (ChlPPS) database. Therefore, this

finding analyzes preference among recruits of different demographic groups who entered the Academy, rather than among candidates of different demographic groups throughout the hiring process.[56]

Notwithstanding this limitation in the data, the preference system may be a tool for improving racial equity in CPD's hiring process, although the veterans' preference may increase the male/female imbalance. Targeted recruitment of former CPS students and veterans could help to further address the disproportionate attrition of minority race groups through CPD's hiring process.

RECOMMENDATIONS

9. CPD and OPSA HR should consider targeted and regular recruitment activities for recent CPS graduates, particularly for Black graduates.

10. CPD and OPSA HR should consider further investment in female veterans' recruitment.

[ba] Finding 5 below describes how data constraints limit the possible analysis of CPD's overall hiring process overall.

MANAGEMENT RESPONSE

9. *CPD and OPSA HR have implemented a CPFTA program in partnership with Chicago schools, both public and private. CPD and OPSA HR worked with CPS to develop the program, which provides a preference to applicants who participate in the program.*

10. *OPSA HR, CPD and DHR have already invested such efforts, such as by offering the CPOE exam on military bases throughout the country and advertising through The Griffon, which is the premier magazine for veterans concerning these topics.*

FIN DIN G 4V AC A D E M Y|R E C R U ITS^A R EiC LU STE E D" RACE/ETHNICITY AND NEIGHBO RHOO D; WITH SOME NEIGHBORHOODS STRONGLY REPRESENTED AND OTHERS LITTLE REPRESENTED; . ^^^^^1 '

OIG found that among the 2,610 identifiable candidates who successfully completed the hiring process and entered the Academy as recruits in the period studied, Chicago's 77 community areas were represented to varying degrees, as shown below in Figure 22. The most concentrated areas Academy recruits hailed from were on the Northwest and Southwest Sides of Chicago, including Dunning (105 recruits), Norwood Park (94 recruits), and Mount Greenwood (105 recruits). These areas have historically had high numbers of CPD members and are predominantly White. The high representation of recruits from these areas might be explained by those applicants being more likely to have CPD members in their social networks, and perhaps therefore being more motivated to apply or more likely to have access to information such as the open application window, upcoming exam dates, and application requirements, which would equip them to successfully navigate the lengthy and multi-stage hiring process.[57] On Chicago's West Side, most recruits came from Austin (50 recruits) or South Lawndale (48 recruits), and relatively few recruits came from neighborhoods on the South Side.

[5/] A person's "social network" is their set of personal, professional, and familial relationships. An established body of research shows that social networks are an important source of "social capital." "Certain people are connected to certain others, trusting certain others, obligated to support certain others, dependent on exchange with certain others One's position in the structure of these exchanges can be an asset in its own right. That asset is social capital" Ronald Burt, Brokerage and Closure: An Introduction to Social Capital (Oxford. Oxford University Press, 2005), p. 4. Both "strong ties" (such as family and close friends) and "weak ties" (mere acquaintances) in a person's social network may play an important role in creating professional opportunities, for example, by providing knowledge of job openings and information about how to navigate job application processes successfully. See Sandra Smith, "Don't put my name on it": Social Capital Activation and Job-Finding Assistance among the Black Urban poor," American Journal of Sociology 111, no. 1, 2005, p. 1--57, accessed March 4, 2021, <https://mequality>. stanford.edu/sites/default/files/media/ <http://stanford.edu/sites/default/files/media/> media/pdf/Reference%20Media/Snnth 2005 Social Networkds.pdf; Robert Sampson, Great American City: Chicago and the Enduring Neighborhood Effect (Chicago: University of Chicago Press, 2012), p. 38-39

FIGURE 22: NUMBER OF ACADEMY RECRUITS BY COMMUNITY AREA

See Appendix Cfor key to community areas. Source: OIG analysis.

OIG FILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

FIGURE 23: NUMBER OF ACADEMY RECRUITS BY RACE/ETHNICITY AND COMMUNITY AREA

Academy Attendees - Hispanic

Academy Attendees - Asian

Academy Attendees - White

Academy Attendees - Black or. African American

Source: OIG analysis.

In Chicago, neighborhoods are highly segregated by race. In this context, OIG found that CPD recruits of different race groups were concentrated in different community areas. White recruits were highly concentrated in areas on the Northwest Side, such as Norwood Park (70 recruits)

and Dunning (55 recruits), and Mount Greenwood on the Southwest Side (79 recruits). Black recruits were most concentrated in areas on the South and Southwest Sides, such as Ashburn (24 recruits) and Roseland (23 recruits), and Austin on the West Side (27 recruits). Hispanic recruits were most concentrated in the Northwest and Southwest Sides, with Belmont Cragin (67 recruits) being the most heavily represented community area. Asian recruits were most concentrated on the North Side in West Ridge (14 recruits) and on the near South Side in Bridgeport (10 recruits) and Armour Square (11 recruits).

While the community areas for recruits of different races tended to align with the racial makeup of Chicago neighborhoods, (e.g., Black recruits hailed from majority Black neighborhoods, White recruits hailed from majority White neighborhoods), there are also community areas that have high concentrations of White, Black, or Hispanic residents but had very few recruits represented in CPD's Academy. For the purposes of this evaluation, the most notable discrepancy was the relatively small number of recruits hailing from the areas in the primarily Black far South Side of Chicago, presenting a potential area of opportunity for CPD to focus recruitment efforts and improvements to the equity of its hiring process.

RECOMMENDATIONS

To increase the diversity of recruits hired, CPD and OPSA HR should:

11. Engage City Council members across the city to participate in grassroots recruiting and allocate additional resources to community areas that currently are underrepresented among CPD's recruits.[58]

12. Expand existing community networks in predominantly Black communities that are already represented among Academy recruits in order to bolster recruitment of Black candidates.

MANAGEMENT RESPONSE

11. *OPSA HR is developing a letter to send to all City Council members asking for their assistance in locating and identifying candidates in their wards to be recruited to become police officers. OPSA HR will offer to provide resources. OPSA HR will also attend ward job fairs when invited, as well as establishing set job fairs at ward offices.*

12. *OPSA HR and CPD are creating a unit within the CAPS office whose members will be dedicated to recruiting all year, with a focus on grassroots community outreach. This includes Black communities along with other underrepresented groups. This will be a targeted recruiting effort.*

[b3] In budget hearings from 2016 to 2020, City Council members have expressed an interest in working to increase diversity at CPD.

,FINDING 5: THE FAILURE TQTRACK INDIVIDUAL^ CANDIDATES AT EACH STAGE IN THE PROCESS AND "OTHER DATA UMiTATJONS IMPAIR ANA LYS1 SibF|TMeI EQUITY OF CPD'S HIRING PROCESS 41^;;. ;

OIG found that CPD does not track individual candidates throughout each stage in the hiring process, nor does it clearly record the attrition of candidates who abandon their applications. These drawbacks of the available data limit the analyses that can be completed for candidates in CPD's hiring process. CPD is unable to track what happens to individual applicants at each of the stages that fall between the CPOE exam and entrance into the Academy. CPD's data collection at these intermediate stages is limited in several respects:

1. CPD and DHR do not assign unique identifiers to applicants. This makes it impossible to identify all individuals who submit multiple applications or to differentiate candidates with the same or similar names.
2. CPD did not provide OIG with a systematic record of individuals who submitted appeals to the Human Resources Board (HRB) after failing at the background investigation stage. For this reason, OIG was unable to conduct any analysis on the equity impact of HRB appeals.[59]
3. DHR's status classifications at each stage create uncertainty in examining why candidates fail out of the process. For example, after the elimination of the required CPOE payment in 2016, DHR's records retained "Payment" as a stage in the hiring process and recorded some applicants as rejected with the reason code "No Payment." DHR reported to OIG that this reflects applicants who have incomplete applications and that it is used to provide reminders to these candidates to complete the application prior to the closing date. Another example of unclear status classification is the continued listing of candidates as "Pending" even years after taking the CPOE. Clearer data management of candidate status by DHR could decrease the uncertainty around the ultimate outcome of these applications.

More consistent and complete data collection by DHR and CPD would allow for future analyses of this topic to reach stronger conclusions. The simplest and most impactful change would be to track individual applicants with unique identifiers, attached to them at every stage of the process and, for those who submit more than one application, in every application submitted.

[j9] Aggregated race and gender data was made available to OIG on candidates who appealed after elimination at the psychological test stage. However, as noted in Appendix B, psychological test appeals and reinstatements did not appear to affect the racial/ethnic composition of the applicant pool. The appeal process available to candidates is described in more detail in Appendix B

A. UNLIKE CANDIDATE DATA DURING THE HIRING PROCESS, DATA AFTER APPLICANTS ENTER THE ACADEMY IS COMPLETE AND IDENTIFIABLE

Once applicants reach the Academy stage of the hiring process, they are placed on the City's payroll and their information is entered into the ChIPPS database. This system allows for detailed tracking of trends in education level, race, gender, age, CPS and veteran preference status, and neighborhood of residence for candidates who successfully become recruits. It is also possible to match almost all of these individuals to the CPOE exam they took, thus allowing calculations of the length of the application process for candidates who make it to the Academy.

OIG found that 2,626 individuals started at the Academy after having taken CPOE exams during 2016, 2017, or 2018. Of these records, OIG was able to match 2,622 (99.9%) to their CPOE exam results. Of these 2,622 individuals, OIG was able to determine education level, race, gender, age, CPS and veteran preference, and neighborhood of residence for 2,610 (99.5%) of them.

B. CPD'S COLLECTION OF APPLICANTS' DEMOGRAPHIC INFORMATION IS INCONSISENT THROUGHOUT THE HIRING PROCESS

In this analysis, OIG used data on PO candidates collected at multiple stages in the hiring process, by both CPD and DHR. OIG found that the demographic categories used in these data collection efforts were inconsistent across stages and at times unclear.

In Figure 24 below, three sources of demographic information are compared. The first source is data collected by DHR at the initial application, which is eventually transferred into the ChIPPS database when successful candidates are hired as recruits in the Academy. The second source is demographic information provided by CPD on candidates who failed the psychological exam and appealed, which had inconsistent categories within the datasets for this stage and did not distinguish race and ethnicity. The third source is data from CPD on candidates successfully hired as recruits in the Academy, which had only very broad categories for race and did not distinguish ethnicity from race.

FIGURE 24: INCONSISTENT DEMOGRAPHIC CLASSIFICATIONS IN CITY DATA ON CPD APPLICANTS

Mi	;: Taleb/ChIPPS Demographer ' Classifications .:	■~'\ Demographic: Classifications* ;V; pfoyid^j]y.jtPDto OIG in ... Relation;® Psychological Test -ilfAppeals[60] ■	, Demographic , Classifications Provided by .; CPD to OIGlri Relation to ; .. Academy Entrants
Race	• American Indian or Alaska Native • American • Native Hawaiian or Other More Races • White • 1 do not wish t	• Al • AS • BLK • OTH • S • TWO • WH • DNP	• Asian • Black • Hispanic • Other • White
Eth	• Hispanic or Latino • Not Hispanic or Latinc	*Not tracked as a separate category*	*Not tracked as a separate category*
Gende	• Male • Female • 1 do not wish to provic	• Male • Female • 1 do not wish to provide this information	• Male • Female

Source: OIG analysis.

Because demographic data on candidates who go through the appeal process was categorized differently from data on candidate attrition at other stages, OIG was unable to report on the race/ethnicity equity impact of the psychological test appeals process. Furthermore, CPD's use of "male" and "female" as gender categories in its record-keeping conflates sex with gender. This coding is also underinclusive by failing to give reporting options for individuals who identify themselves transgender or gender nonbinary.[61]

C. IDENTIFICATION AND TRACKING OF UNIQUE APPLICANTS WOULD ALLOW FOR MORE POWERFUL FUTURE ANALYSES

Because CPD does not assign unique identifiers, CPD is unable to analyze many trends that might have equity implications, including:

"° The race data collected at the psychological test appeal stage indicated in this chart reflects the data that was collected in 2017. CPD also provided OIG with psychological test data from the 2016 CPOE administration that uses a different race classification from any of those represented in the table above: "Asian"; "Black or African American"; "Hispanic or Latino"; "White"; and "I do not wish to provide this information."

"[1] As of June 2020, at least one CPD member has openly come out as transgender. Hush, Chris, "Chicago Police Department's only out Transgender officer goes on record." NBC5 Chicago, June 25, 2020, accessed March 4, 2021, <https://www.nbcchicafio.com/news/chicaRO-police-department-transRender-officerl/2295602/>.

1. The number and demographic profile of candidates who submit multiple PO applications.
2. The attrition points in the process for candidates who submit multiple applications and whether attrition at a particular stage is predictive of attrition at the same stage in a subsequent application.
3. The total number of unique individuals in the initial applicant pool (as opposed to unique applications).
4. The duration of each stage in the process for candidates and whether there are race-, ethnicity-, or gender-based disparities in the time candidates spend at each.
5. Correlations between candidate education level and success in the CPOE exam or any other hiring process stage.
6. Neighborhood-of-residence distribution for the initial applicant pool and its change through each successive stage.
7. The equity impact of appeals to the Police Board by candidates who initially fail at the background investigation

stage.

8. The demographic breakdown of candidates claiming CPS or veterans' preference at the initial application stage.
9. Correlations between CPS or veterans' preference claims and applicant success.
10. An exact count of candidates who are referred to DHR but choose not to report to the Academy and the demographic breakdown of those candidates.

All of these measures would help CPD to understand the equity impact of its current recruitment efforts and hiring process and might inform process improvements, such as providing timely and accurate notifications to eliminated applicants. Furthermore, CPD's ability to analyze attrition by stages in the hiring process would be improved by reducing the ambiguity in several application status classifications.

RECOMMENDATIONS

13. CPD and OPSA HR should coordinate with DHR to track individuals across multiple applications and CPOE administrations, and through every stage of the process, with a unique individual identifier.

14. CPD and OPSA HR should coordinate with DHR to review the procedure for applying status classifications to candidates and ensure that all candidates who are definitively out of consideration for a PO position are assigned a status classification that reflects that fact.

15. CPD and OPSA HR should work with City DHR to establish and use consistent and appropriate race and ethnicity classifications in all CPD and DHR forms used throughout the PO hiring process (e.g., collecting data on race and ethnicity separately and tracking "Hispanic" as an ethnicity classification, not a race classification).

16. CPD and OPSA HR should apply consistent and appropriate gender categories ("man", "woman", "transgender", "a gender not listed here") when asking about gender on data

collection and reporting forms.

17. CPD and OPSA HR should assess whether it is informative and appropriate to collect data on sex assigned at birth in addition to gender.

MANAGEMENT RESPONSE

13. *The Taleo system already assigns a unique number to each applicant. While applicants are encouraged to use the same applicant profile for all of their applications, there are instances when an applicant will create a new profile and apply for positions using the new profile. This means that the new profile will be assigned a new unique number. While it is possible to "merge" profiles in Taleo, the Taleo user manual warns that doing so may result in lost data from the secondary candidate file. OPSA HR will work with DHR to evaluate what data would be lost and whether there is any ability to recover lost data before making a determination on whether or not to merge applicant profiles. If DHR determines that the loss of data presents unacceptable risks, they will not move forward.*

14. *This process is already done through the TALEO system, which has a disqualifying status classification for each step of the hiring process. Once a candidate is placed in this classification, they receive an e-mail advising them of their disqualification.*

15. *OPSA HR agrees that it should establish and use consistent and appropriate race and ethnicity classifications and is working to bring CPD's classification system in line with the City's classification system. CHIPPS is set up to be able to report in compliance with Federal EEO-4 and EEO-P requirements. A significant challenge exists as it relates to historical CPD race and ethnicity data because of an old mainframe system. OPSA HR is working with DHR, OPSA IT, and CPD to resolve these issues to create a consistent system.*

16. *OPSA HR will work with DHR to apply consistent and appropriate gender categories when asking about gender on data collection and reporting forms concerning the recruiting and hiring process for police officers. Please note that DHR already added "non-binary" as a gender option to Taleo in late 2020.*

17. *CPD and OPSA HR will continue to work with DHR to assess whether it is informative and appropriate to collect data on sex assigned at birth in addition to gender.*

V. CONCLUSION

While CPD has made some efforts to increase the recruitment of Black candidates, this evaluation found that it is the disproportionately high attrition of Black candidates throughout the hiring process, not a lack of applicants, that is most responsible for the low number of Black Police Officers ultimately hired. For female candidates, it is both a low application rate relative to male candidates and the disproportionate impact of the hiring process that lessens female representation by the time of hire. The demographic group that sees its proportional representation decrease most acutely through the hiring process is Black female applicants.

OIG encourages CPD to continue to evaluate for bias the stages of its hiring process that have most contributed to the disproportionate attrition of Black and female candidates, and to assess whether the tests and standards at each stage validly select for job-relevant skills and abilities. CPD can also seek to remediate major drivers of attrition by reducing no-shows and making efforts to improve candidate preparedness.

APPENDIX A: AGGREGATED COUNT OF APPLICANTS BY TERMINAL STAGE, RACE, AND GENDER FOR ALL EXAM SESSIONS[62]

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Source- OIG analysis.

Stage 17, "Refer to DHR" reflects the number of applicants invited to the Academy.

APPENDIX B: APPEALS AND REINSTATEMENTS

Two appeals processes are open to candidates who are disqualified in the Police Officer (PO) hiring process up to this point. During the period of analysis for this evaluation, candidates could appeal when they failed the background investigation by requesting a hearing before the City's Human Resources Board, a three-member Board appointed by the Mayor.[63]

At these hearings, the relevant CPD background investigator was called to present the facts that led to the candidate's removal from the eligibility list. The candidate or their counsel had an opportunity to provide documentation or mitigating information on the candidate's behalf. The Board determined whether to overturn or uphold CPD's initial decision on eligibility. If CPD did not agree with the Board's determination to return candidate to the eligibility list, they could sue the Board and have the case heard at the Circuit Court of Cook County.

Recently, CPD started providing an appeals process for the psychological assessment. Candidates who wish to appeal their initial determination have 21 days to request an appeal. On appeal, candidates are evaluated by the secondary vendor-if the candidate's initial assessment was performed by the Center for Applied Psychology and Forensic Studies, they will be evaluated on appeal by Law Enforcement Psychological Services, Inc., and vice versa. A positive evaluation by the second psychologist will result in a candidate being reinstated in the process. Candidates who successfully appeal are returned to the eligibility list. Separate from the appeals process, candidates may re-enter the application pool by applying for a new PO posting. This is the only course of action available to candidates who fail to appear for any stage of the hiring process.

Of the two appeals processes available for PO candidates, one had sufficient data quality for OIG to analyze: the psychological test appeal. The psychological test appeal does not appear to have an equity impact on the race demographics of the hiring pool. While the small numbers of candidates involved make it difficult to draw strong conclusions, the rate at which appeals are granted for the largest racial classifications (White, Black, and Did Not Provide) are all similar (33%, 36%, and 30%, respectively, of 409 total appeals). Unfortunately, the available data does not allow for a rigorous assessment of whether any race group is disproportionately likely to file an appeal, because the race classifications assigned to candidates in the psychological test appeal process do not match DHR's race classifications assigned to candidates eliminated at the psychological exam stage. Thus, while there may be an equity impact of this process because one race group is more likely than another to file a psychological test appeal, the available data cannot answer this question.

In July 2020, Chapter 2-84 of the Municipal Code of Chicago was amended to grant the Police Board the power to consider appeals by applicants for PO who have been removed from CPD's eligibility list due to the results of a background examination.

OIG PILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

PSYCHOLOGICAL TEST APPEALS AND REINSTATEMENTS BY RACE/ETHNICITY

Race/Ethnicity Group;^.,.^Total Appeals ■	...=,	^PPea!|Deriied ¡i|g^		
American Indian [AI]	30	24	6 (20%)	
Asian [AS]	24	22	2 (8%)	
Black [BLK]	72	46	26 (36%)	
Hispanic [S]	15	5	10 (67%)	
Other [OTH]	3	2	1 (33%)	
Two or More Races [TWO]	23	18	5 (22%)	
White [WH]	192	129	63 (33%)	
Did Not Provide [DNP]	50	35	15 (30%)	

Source: OIG analysis.

Additionally, the psychological test appeal does not appear to have an equity impact on the gender composition of the hiring pool. The percentage of male and female candidates who fail at the psychological test stage and elect to appeal is almost identical (73.0% of male candidates versus 73.2% of female candidates). The rate at which appeals are granted is higher for female candidates than for male candidates (40% versus 29%). Taken together, these two facts show that the psychological test appeal process does not contribute to the overall trend of reduced female representation in the hiring pipeline.

PSYCHOLOGICAL TEST APPEALS AND REINSTATEMENTS BY GENDER

Gender	Total Appeals (%of. Applicants Eliminated at the Psychological Test Stage)	; Appeals Granted (% of ' Total Appeals)*!!^
Male	218	87 (29%)
Female	61	40 (40%)
	305 (75%)	
	101 (77%)	

Source: OIG analysis.

OIG FILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

APPENDIX C: COMMUNITY AREAS KEY

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Source: OIG-generated map.

1	ROGERS PARK	17	DUNNING	33	NEAR SOUTH SIDE	49	ROSELAND	65	WEST LAWN
2	WEST RIDGE	18	MONTCLAIRE	34	ARMOUR SQUARE	50	PULLMAN	66	CHICAGO LAWN
3	UPTOWN	19	BELMONT CRAGIN	35	DOUGLAS	51	SOUTH DEERING	67	WEST ENGLEWOOD
4	LINCOLN SQUARE	20	HERMOSA	36	OAKLAND	52	EAST SIDE	68	ENGLEWOOD
5	NORTH CENTER	21	AVONDALE	37	FULLER PARK	53	WEST PULLMAN	69	GREATER GRAND CROSSING
6	LAKEVIEW	22	LOGAN SQUARE	38	GRAND BOULEVARD	54	RIVERDALE	70	ASHBURN
7	LINCOLN PARK	23	HUMBOLDT PARK	39	■KENWOOD	55	HEGEWISCH	71	AUBURN GRESHAM
8	NEAR NORTH SIDE	24	WEST TOWN	40	WASHINGTON PARK	56	GARFIELD RIDGE	72	BEVERLY
9	EDISON PARK	25	AUSTIN	41	HYDE PARK	57	ARCHER HEIGHTS	73	WASHINGTON HEIGHTS
10	NORWOOD PARK	26	WEST GARFIELD PARK	42	WOODLAWN	58	BRIGHTON PARK	74	MOUNT GREENWOOD
11-	JEFFERSON PARK	27	EAST GARFIELD PARK	43	SOUTH SHORE	59	MCKINLEY PARK	75	MORGAN PARK
12	FOREST GLEN	28	NEAR WEST SIDE	44	CHATHAM	60	BRIDGEPORT	76	OHARE
13	NORTH PARK	29	NORTH LAWN DALE	45	AVALON PARK	61	NEW CITY	77	EDGWATER
14	ALBANY PARK	30	SOUTH LAWN DALE	46	SOUTH CHICAGO	62	WEST ELSDON		
15	PORTAGE PARK	31	LOWER WEST SIDE	47	BURNSIDE	63	GAGE PARK		
16	IRVING PARK	32	LOOP	48	CALUMET HEIGHTS	64	CLEARING		

APPENDIX D: CPD AND OPSA RESPONSE TO RECOMMENDATIONS

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Department or folic* • City or Chicago

3510 S Michigan Avenue • Chicago, Illinois 60653

David (). Ilrown

Superintendent of Police

June 18, 2021
VIA ELECTRONIC MAIL

Ms. Deborah Witzburg Deputy Inspector General Public Safety Section
City of Chicago Office of Inspector General 740 N. Sedgwick, Suite 200 Chicago, Illinois 60654
dwitzburg@igchicago.org <mailto:dwitzburg@igchicago.org>

Re: CPD's and OPSA-HR's Response to OIG's Evaluation of the Demographic Impacts of the Chicago Police Department's Hiring Process

Dear Deputy Inspector General Witzburg:

The Chicago Police Department ("CPD") and the Office of Public Safety Administration ("OPSA HR") has prepared the following responses to recommendations 1 through 17 of the Evaluation of the Demographic Impacts of the Chicago Police Department's Hiring Process ("OIG Evaluation").

Recommendation 1: CPD should clarify its stated goal of "look[ing] for candidates that reflect our communities' broad cross-sections" by specifying benchmarks for diversity in hiring.

Response: CPD and the City have engaged a consultant for Consent Decree work for Recruitment Hiring and Promotions that will address this recommendation. In collaboration with the Department of Law ("DOL"), City Department of Human Resources ("DHR"), CPD, and OPSA HR, the consultant will develop a framework, best practices, and benchmarking. CPD and the City are in the initial phases of gathering and sharing information, but the consultant will not fully begin work until January 1, 2022, which is when budgeted funds will be available. OPSA HR is in the process of coordinating with the consultant to identify the deliverables that the consultant will provide.

Recommendation 2: CPD and OPSA HR should ensure that, as far as possible under applicable law, candidates are eliminated only on grounds relevant to their potential performance as POs by evaluating the following hiring process stages for bias and accuracy in predicting job performance:

a. the format and content of the CPOE;
b the use of the Pre-POWER Test as a disqualifies
c. *the questions in the Personal History Questionnaire;*
d. *the background investigation disqualifying conditions; and*
e. *the minimum qualification conditions.*

Response: CPD and OPSA HR note that these recommendations are like those in Consent Decree paragraphs 258 and 259. CPD and OPSA HR are working in collaboration with DHR and DOL to achieve

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compliance with these paragraphs. Specifically.

2(a) - DHR, CPD, and OPSA HR regularly evaluate the format and content of the CPOE in accordance with the Uniform Guidelines on Employment Selection Procedures ("Uniform Guidelines"). The Uniform Guidelines provide employers with a framework for determining the proper use of tests and other selection methods. As part of the evaluation, DHR engages a vendor to conduct both a job analysis and a validation study to evaluate the job-relatedness of the CPOE. This process has been used for past administrations of the CPOE. We also note that we are currently going through this evaluation process again.

2(b) - CPD and OPSA HR continue to evaluate the Pre-POWER test as an accurate predictor of whether a candidate will be able to enter the Academy, as well as to avoid bias. Beginning July 2021, a candidate who does not successfully pass all components of the Pre-POWER test will no longer be automatically disqualified from continuing the application process. Instead, the Pre-POWER test will help inform a candidate as to their likelihood of completing the state-required POWER test, which a candidate must successfully pass before entering the Academy. We will inform and engage candidates to help prepare them for the state-required POWER test.

2(c) - CPD, and OPSA HR in consultation with DHR continue to review the PHQ to ensure that it avoids bias and accurately reflects a candidate's suitability for the role of police officer. Based on candidate feedback and review of processes, candidates are now being given additional time to complete the PHQ.

2(d) - CPD, and OPSA HR in consultation with DHR continue to review the background investigation disqualifying conditions to ensure that they avoid bias and accurately reflect a candidate's suitability for the role of police officer.

2(e) - CPD, and OPSA HR in consultation with DHR continue to review the minimum qualification conditions to ensure that they avoid bias and accurately reflect a candidate's suitability for the role of police officer.

Recommendation 3: CPD and OPSA HR should seek ways to shorten the length of the nearly year-and-a-half long PO hiring process, to avoid losing qualified applicants who are unable or unwilling to wait so long to secure a position.

Response: CPD and OPSAHR, in consultation with DHR, continue to evaluate the hiring process and look for ways to streamline. However, this is a common issue across law enforcement. The Evaluation highlights a "medium duration", but this does not reflect that applicants during the evaluation period (2016-2018) could take the CPOE at age 18 even though they were not eligible to enter the Academy until age 21. Since 2018, CPD and OPSA HR have taken substantial steps to shorten the hiring process, and now an applicant could enter the Academy in as little as 4-6 months after passing the CPOE. CPD and OPSA HR continue to look for ways to further shorten the hiring process while maintaining the high standards expected of police officers The City has also worked to reduce the timeframe for which candidates receive their results after completing the CPOE.

Recommendation 4 CPD and OPSA HR should provide candidates more detail about disqualifying standards in the background investigations process, particularly around family members and acquaintances' personal and criminal histories.

Response: CPD and OPSA HR will post more detail about the disqualifying standards in the background investigation process.

Recommendation 5: CPD and OPSA HR should assess communication to candidates in advance of the CPOE and first POWER test and should consider deploying targeted messaging to demographic groups with high attrition rates to encourage and enable candidates to show up on the test day.

Response: Since the end of the Evaluation period, CPD and OPSA HR have committed to do 8 "touches" with candidates between the time of application and administration of the CPOE. These touches come via email and text message, and include providing study guides, reminders, and offering physical training classes at the Academy. CPD and OPSA HR are working to provide applicants and candidates with a program that includes dietary suggestions, as well as physical training classes, including classes targeted specifically for female candidates. Additional preparation materials will also be added to the recruiting website. CPD and OPSA HR will continue to work with DHR and DOL to determine a legally appropriate way to deploy targeted messaging to demographic groups with high attrition rates.

Recommendation 6: CPD and OPSA HR should assess the equity of accessibility for test preparation sessions and materials for the CPOE and POWER test and seek out additional ways to lower administrative hurdles for candidates, such as offering an online exam or make-up testing days for candidates who do not appear for the CPOE and/or POWER test.

Response: Since the end of the evaluation period in 2018, OPSA HR has undertaken substantial steps to increase opportunities for applicants to take the CPOE. The CPOE test is being offered online in June 2021 on multiple days and at multiple times. Candidates can take the exam securely from their home or complete testing at many available testing center across the region and nationally. There are also multiple dates and times for applicants to take the Pre-POWER test. CPD and OPSA HR will also accept the POWER card that an applicant may get at locations approved to administer the POWER test. Finally, OPSA HR is also looking to > partner with different groups to hold POWER preparation and training sessions at various locations throughout the city.

Recommendation 7: CPD and OPSA HR should consider recruitment, outreach, and informational and training sessions targeted to female applicants to help prepare them for the POWER test.

Response: As noted in response to recommendations 5 and 6, CPD and OPSA HR have already taken substantial steps to provide female applicants with access to informational and training sessions to help them prepare for the POWER test. CPD is currently working on updating its recruiting website with additional training information targeted toward female applicants and adding dietary information to the website as well. Finally, CPD and OPSA HR are partnering with law enforcement interest groups, including the Chicago Association of Women in Law Enforcement (CAWLE) to make further outreach to female applicants, the National Organization of Blacks in Law Enforcement (NOBLE), the National Association of Black Law Enforcement Officers (NABLE), the National Association of Blacks in Criminal Justice (NABCJ), the Hispanic American Police Commanders Association (HAPCOA), and the Hispanic National Law Enforcement Association (HNLEA).

Recommendation 8: CPD and OPSA HR should consider ways to improve CPOE and POWER test passing rates. For example, CPD might consider allowing applicants who nearly meet the expected standards in the first POWER test to remain in the candidate pool, providing an opportunity for these candidates to prepare and pass the final POWER test

Response: CPD and OPSA HR agree that they should consider ways to improve CPOE and POWER test passing rates, and, as noted above, have already taken substantial steps since 2018 to achieve this. Regarding the CPOE, the last 3 rounds of test administration have seen an average pass rate of 94.7%, with African Americans passing at a rate of 88.6%. The City is working with the CPOE test developer to improve test utility while reducing group differences. Also as noted above, failing to pass the Pre-POWER test will no longer be an automatic basis to disqualify a candidate from further consideration. CPD and OPSA HR cannot make any adjustment to the state-required POWER test requirements, but, as noted above, will work with candidates on training and nutrition to assist with passing the POWER test

Recommendation 9: CPD and OPSA HR should consider targeted and regular recruitment activities for recent CPS graduates, particularly for Black graduates.

Response: CPD and OPSA HR have implemented a CPFTA program in partnership with Chicago schools, both public and private. CPD and OPSA HR worked with CPS to develop the program, which provides a preference to applicants who participate in the program.

Recommendation 10: CPD and OPSA HR should consider further investment in female veterans' recruitment.

Response: OPSA HR, CPD and DHR have already invested in such efforts, such as by offering the CPOE exam on military bases throughout the country and advertising through The Griffon, which is the premier magazine for veterans concerning these topics.

Recommendation 11: CPD and OPSA HR should engage City Council members across the city to participate in grassroots recruiting and allocate additional resources to community areas that cun-ently are underrepresented among CPD's recruits.

Response: OPSA HR is developing a letter to send to all City Council members asking for their assistance in locating and identifying candidates in their wards to be recruited to become police officers. OPSA HR will offer to provide resources. OPSA HR will also attend ward job fairs when invited, as well as establishing set job fairs at ward offices.

Recommendation 12: CPD and OPSA HR should expand existing community networks in predominantly Black communities that are already represented among Academy recruits in order to bolster recruitment of Black candidates.

Response: OPSA HR and CPD are creating a unit within the CAPS office whose members will be dedicated to recruiting all year, with a focus on grassroots community outreach. This includes Black communities along with other underrepresented groups. This will be a targeted recruiting effort.

Recommendation 13: CPD and OPSA HR should coordinate with DHR to track individuals across multiple applications and CPOE administrations, and through every stage of the process, with a unique individual identifier.

Response: The Taleo system already assigns a unique number to each applicant. While applicants are encouraged to use the same applicant profile for all of their applications, there are instances when an applicant will create a new profile and apply for positions using the new profile. This means that the new profile will be assigned a new unique number While it is possible to "merge" profiles in Taleo, the Taleo user manual warns that doing so may result in lost data from the secondary candidate file. OPSA HR will work with DHR to evaluate what data would be lost and whether there is any ability to recover lost data before making a determination on whether or not to merge applicant profiles. If DHR determines that the loss of data presents unacceptable risks, they will not move forward

Recommendation 14: CPD and OPSA HR should coordinate with DHR to review the procedure for applying status classifications to candidates and ensure that all candidates who are definitively out of consideration for a PO position are assigned a status classification that reflects that fact.

Response: This process is already done through the TALEO system, which has a disqualifying status classification for each step of the hiring process. Once a candidate is placed in this classification, they receive an e-mail advising them of their disqualification

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CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

Recommendation 15' CPD and OPSA HR should work with City DHR to establish and use consistent and appropriate race and ethnicity classifications in all CPD and DHR forms used throughout the PO hiring process (e.g., collecting data on race and ethnicity separately and tracking "Hispanic" as an ethnicity classification, not a race classification).

Response: OPSA HR agrees that it should establish and use consistent and appropriate race and ethnicity classifications and is working to bring the CPD's classification system in line with the City's classification system. CHIPPS is set up to be able to report in compliance with Federal EEO-4 and EEO-P requirements. A significant challenge exists as it relates to historical CPD race and ethnicity data because of an old mainframe system. OPSA HR is working with DHR, OPSA IT, and CPD to resolve these issues to create a consistent system.

Recommendation 16: CPD and OPSA HR should apply consistent and appropriate gender categories ("man", "woman", "transgender", "a gender not listed here") when asking about gender on data collection and reporting forms.

Response: OPSA HR will work v/ith DHR to apply consistent and appropriate gender categories when asking about gender on data collection and reporting forms concerning the recruiting and hiring process for police officers. Please note that DHR already added "non-binary" as a gender option to Taleo in late 2020.

Recommendation 17- CPD and OPSA HR should assess whether it is informative and appropriate to collect data on sex assigned at birth in addition to gender.

Response: CPD and OPSA HR will continue to work with DHR'to assess whether it is informative and appropriate to collect data on sex assigned at birth in addition to gender.

Sincerely,

Scott Spears
Assistant General Counsel Office of the Superintendent
Chicago Police Department

CC. Dana O'Malley, General Counsel, Chicago Police Department
Robert Landowski, Director of Human Resources, Office of Public Safety Administration Tenaya Williams, General Counsel, Office of Public Safety Administration

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CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION JULY 8, 2021

Joicpri M feiguio*! Inspector 'Jenerai
OFFICE OF INSPECTOR GENERAL City of Chicago

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Management Response Form

Project Title: Evaluation of the Demographic Impacts •pf the Chicago Police Department's Hiring Process

Project Numher: 18-0860

Department Name: Chicago Police Department

Date: 6/18/2021

Office of PuhlicSafety Administration

Department Head: David Brown
Annastasia Walker

	Dbafree		|. Implementation li<T*rK*tbmU<	Party Responsible
1. CPD should clarify its stated goal of "lookjing] for candidates that reflect our communities' broad cross-sections" by specifying benchmarks for diversity in hiring.	Agr ee	CPD and the City have engaged a consultant for Consent Decree work for Recruitment Hiring and Promotions that will address this recommendation In collaboration with DOL, DHR, CPD, and OPSA HR, the consultant will develop a framework, best practices, and benchmarking. CPD and the City are in the initial phases of gathering and sharing information, but the consultant will not fully begin work until January 1, 2022, which is when budgeted funds will be available. OPSA HR is in the process of coordinating	July 1, 2022	CPD and OPSA HR In consultation with DOL and DHR

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OIG Recommendation '■'	Agree/ DbafrM	Department's Proposed¹ Action	Implementation Target Dete	Party Responsible
		with the consultant to identify the deliverables that the consultant will provide		
2. CPD and OPSA HR Agree far as possible under ap candidates are eliminat relevant to their potenti by evaluating the follow stages for bias and Bct performance a. the forn CPOE; b. the use of the a disqualifier, c. the que History Questionnaire. investigation disqualifyi tlit- minimum q.iuilih<-J		CPD and OPSA HR note that these recommendations are like those tn Consent Decree paragraphs 258 and 259. CPD and OPSA HR are working in collaboration with DHR and DOL to achieve compliance with these paragraphs. Specifically 2(a) - DHR, CPD, and OPSA HR regularly evaluate the format and content of the CPOE in accordance with the Unifoi m Guidelines on Employment Selection Procedures ("Uniform Guidelines"). The Uniform Guidelines provide employers with a framework for determining the proper use of tests and other selection methods As part of the evaluation, DHR engages a vendor to conduct both a job analysis and a validation itudy to evaluate the job-rclatedness of the CPOE 'I his process has been used for past administrations of the CPOE. We also note that we are currently going through this evaluation process again 2(b) - CPD and OPSA HR continue to evaluate the Pre-POWER test as an accui;ite pri*<lir lor of whether <i uin(!i<i<>le will be able	None. Ihese actions have already been implemented and are part of an ongoing review process	CPD, and OPSA HR in consultation with DHR

Paqe 2 of 10

OIG FILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

■ OIG Recommendation!^-.^;.:' .	A*™/ - ■ Disagree	■ i&s:'-jf"«: '^Department's ProposedAnion.	Implementation TargetPerty Responsible! Date
		lu enter llie Academy, as well as to avoid bias Beginning July 2021, a candidate who does not successfully pass all components of the Pre-POWER test will no longer be automatically disqualified from continuing the application process. Instead, the Pre-POWER test will help inform a candidate as to their likelihood of completing the state-required POWER test, which a candidate must successfully pass before entering the Academy. We will inform and engage candidates to help prepare them for the state-required POWER test. 2(c) - CPD, and OPSA HR in consultation with DHR continue to review the PHO. to ensure that it avoids bias and accurately reflects a candidate's suitability for the role of police officer. Based on candidate feedback and review of processes, candidates arc now being rjiven additional time to complete the PHQ, 2(d) - CPD, and OPSA HR in consultation with DHR continue to review the background investigation disqualifying conditions to ensure that they avoid bias and accurately reflect a candidate's suitability for the role of police officer.	

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		2(e) - CPD, and OPSA HR in consultation with DHH continue to review the minimum qualification conditions to cnsuic that they avoid bias jnd accurately reflect a candidate's suitability for the role of police officer.		
3. CPD and OPSA HR shoufd seek ways to shorten the length of the nearly year-and-a-half long PO hiring process, to avoid losing qualified applicants who arc unable or unwilling to wait so long to secure a position	Ajjiee	CPD and OPSA HR, in consultation with DHR, continue to evaluate the hiring process and look for ways to streamline However, this is a common issue across law enforcement. The Evaluation highlights a "medium duration", but this does not reflect that applicants during the evaluation period (2016-2018) could take the CPOE at age 18 even though they were not eligible to enter the Academy until age 21. Since 2018, CPD and OPSA HR have taken substantial steps to shorten the hiring process, and now an applicant could etitei the Academy in as little as 4-6 months aftei passing the CPOE CPD and OPSA HR continue to look for ways to further shorten the hiring process while maintaining the high standards expected of police officers, The City has also worked to reduce the timeframe for which candidates receive their results after completing the CPOE.	None This is an ongoing process that is already underway,	CPD, and OPSAIIR in consultation with DHR

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CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

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4. CPD and OPSA HR should provide candidates more detail about disqualifying standards in the background investigations process, particularly around family members and acquaintances' personal and criminal histories	Agree	CPDand OPSA HRwill post moie detail about the disqualifying standards in the background investigation process.	January 1, 2022 CPD and OPSA HR
5. CPD and OPSA HR should assess communication to candidates in advance of the CPOE and first POWER test and should consider deploying targeted messaging to demographic groups with high attrition rate* to encourage and enable candidates to show up on the test day.	Agree	Since the end of the Evaluation period, CPD and OPSA HR have committed to do 8 "touches" with candidates between the time of application and administration of the CPOE. These touches come via email and text message, and include providing study guides, reminders, and offering physical training classes at the Academy. CPD and OPSA HR are working to provide applicants and candidates with a program that includes dietary suggestions, as well as physical training classes, including classes targeted specifically for female candidates Additional preparation materials will also be added to the recruiting website CPO and OPSA HR will continue to work with DHR and DOL to determine a legally appropriate way to deploy targeted messaging to demographic groups with high attrition rates	July 1, 2022 CPD and OPSA HR
6. CPD and OPSA HR should assess the equity of accessibility for test preparation sessions and malenals for the CPOE and POWFR test and seek out additional ways to lower	Agree	Since the end of the evaluation per lod in 2018, OPSA HR has undertaken substantial steps to increase opportunities for applicants to take the CPOE The CPOE test is heinn offered online in June 2021 on	None This is an ongoing process that is already underway. CPD and OPSA HR

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administrative hurdles for candidates, such as offering an online exam or make up testing days for candidates who do not appear for the CPOE and/or POWER test.		multiple days and at multiple times Candidates can take the exam securely from then home or complete teslingal many available testing center across the region and nationally. There are also multiple dates and times for applicants to take the Pre-POWER test CPD and OPSA HR will also accept the POWER card that an applicant may get at locations approved to administer the POWER test finally, OPSA HR is also looking to partner with different groups to hold POWER preparation and training sessions at various locations throughout the city.		
7. CPD and OPSA HR should consider recruitment, outreach, and informational and training sessions targeted to female applicants to help prepare them for the POWER test.	Agree	As noted in response to recommendations S and b, CPD and OPSA HR have already taken substantial steps to provide female applicants with access to informational and training sessions to help them prepare for the POWER test CPD is currently working on updating its recruiting website with additional training information targeted toward female applicants and adding dietary information to the websrte as well, finally, CPD and OPSA HR are partnering with taw enforcement interest groups, including the Chicago Association of Women in Law Enforcement (CAWLC) to make further outreach to female applicants, the National Organization of Blacks in Law Enforcement	None. This is an ongoing process that is already underway.	CPD and OPSA HR

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		(NOBLE), the National Association of Black Law E -'nfoi cement Officers (NABIi), the National Association of Blacks in Criminal Justice (NABG), the Hispanic American Police Commanders Association (HAPCOA), and the Hispanic National Law Enforcement Association (HNI.EA).		
8. CPD and OPSA HR should consider . ways to improve CPOE and POWER test passing rates For example, CPD might consider allowing applicants who nearly meet the expected standards in the first POWER test to remain in the candidate pool, providing an opportunity for these candidates to prepare and pass the final POWER test	Agree	CPD and OPSA HR agree that they should consider ways to improve CPOE and POWER test passing rates, and, as noted above, have already taken substantial steps since 2038 to achieve this. Regarding the CPOE, the last 3 rounds of test administration have seen an average pass rate of 94.7%, with African Americans passing at a rate of 88.6%, The City is working with the CPOE test developer to improve test utility while reducing group differences. Also as noted above, failing to pass the Pre-POWER test will no longer be an automatic basis to disqualify a candidate from further consideration. CPD and OPSA HRcannot make any adjustment to the state-required POWER test requirements, but, as noted above, will work with candidates on training and nutrition to assist with passing the POWER test.	None. This is an ongoing process that is already underway.	CPD and OPSA HR
9. CPD and OPSA HR should consider targeted and regular recruitment activities for recent CPS graduates, particularly for Black graduates.	Agree	CPD and OPSA HR have implemented a CPFTA program in partnership with Chicago schools, both public arid private CPD and OPSA HR worked with CPS to develop the	None. This has been implemented.	N/A

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OIG Recommendation	A<raa/	? '■" ■ Department** Proposed Action^; ■	- Implementation Target Date	Perty Responsible
		program, which provides a preference to applicants who participate in the program		
10. CPD and OPSA HR should consider further investment in female veterans' recruitment	Afiree	OPSA HR, CPD and DHR have already invested in such efforts, such as by offering the CPOE exam on military bases throughout the country and advertising through Ihe Griffon, which is the premier magazine for veterans concerning these topics	None. I his has been implemented	N/A

11. CPD and OPSA HR should engage City Council members across the city to participate in grassroots recruiting and allocate additional resources to community areas that currently are underrepresented among CPD's recruits.	Agree	OPSA HR ts developing a letter to send to all City Council members asking for their assistance in locating and identifying candidates in their wards to be recruited to become police officers OPSA HR will offer to provide resources OPSA HR will also attend ward job fairs when invited, as well as establishing set job fairs at ward offices	August 30, 2021	OPSA HR
12. CPD and OPSA HR should expand existing community networks in predominantly Black communities that are already leptesented among Academy recruits in order to bolster recruitment of Blackcandidates.	Agree	OPSA 1 IR and CPD are creating a unit within the CAPS office whose members will be dedicated to recruiting all year, with a locus on grassroots community outreach. This includes Black communities along with other undenepreserited groups. This will be a targeted recruiting effort	August 30, 2021	CPD and OPSA HR
13. CPD and OPSA HR should cooidinate with DHR to hat* individuals across multiple applications and CPOI! administrations, and through every	Agree	Ihe lalen systrjm already assigns a unique number to each applicant. While applicants are encouraged to use the same applicant profile for all of their applications, there are instances when an applicant will create a	lanuaiy 1, 2022	OPSA HRanri DHR

OIG FILE #18-0860
CHICAGO POLICE DEPARTMENT HIRING DEMOGRAPHICS EVALUATION

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stage of tin: process, witli a unique individual identifier.		new profile and apply fur positions using the new profile. This means that the new profile will be assigned a new unique number. While it is possible to "merge" profiles in Taleo, the Taleo user manual warns that doing so may result in lost data from the secondary candidate file OPSA HR will work with DHR to evaluate what data would be lost and whether there is any ability to recover lost data before making a determination on whether or not to merge applicant profiles, if DHR determines that the loss of data presents unacceptable risks, they will not move forward.		
14. CPD and OPSA HR should coordinate with DHR to review the procedure for applying status classifications to candidates and ensure that all candidates who are definitively out of consideration for a PO position are assigned a status classification that reflects that tact.	Agree	rhrs process is already done through the TALEO system, which has a disqualifying status classification for each step of the hiring process. Once a candidate is placed in this classification, they receive an c-rnail advising them of their disqualification	None	N/A
15. CPD and OPSA HR should work with City DHR to establish and use consistent and appropriate race and ethnicity classifications in all CPD and DHR forms used throughout the PO hiring process (e g , collecting data on race and ethnicity separately and tracking "Hispanic"	Agree	OPSA HK agrees that it should establish and use consistent and appropriate race and ethnicity classifications and is working to bring the CPD's classification system in line with the City's classification system. CHIPPS is set up to be able to report in compliance wilfi Federal EEO-4 and EEO-Prequirements. A significant challenge exists as it relates to historical CPD race and ethnicity data	July 1, 2022	DHR, CPD, OPSA IT, and OPSA HR

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as an ethnicity classification, not a race classification)		because of an old mainframe system OPSA HR is working with DHR, OPSA II", and CPD to resolve* these issues to create a consistent system		
16. CPD and OPSA HR should apply consistent and appropriate gender categories ("man", "woman'*, "transgender", "a gender not listed here") when asking ahout gender on data collection arid reporting forms	Afyee	*OPSA HK will work with DHR to apply consistent and appropriate gender categories when asking about gender on data collection and reporting forms concerning the recruiting and hiring process for police officers. Please note that DHR already added "non-binary" as a gender option to Taleo in late 707.0*	July 1, 2022	DHR, CPU, and OPSA HR
17. CPD and OPSA HR should assess whether it is informative and appropriate to collect data on sex assigned at birth in addition to gender.	Agree	CPD and OPSA HR will continue to work with £>HR to assess whether it is informative and appropriate to collect data on sex assigned at birth in addition to gender.	July J, 2022	CPD, and OPSA HR in consultation with DHR

The City of Chicago Office of Inspector General (OIG) is an independent, nonpartisan oversight agency whose mission is to promote economy, efficiency, effectiveness, and integrity in the administration of programs and operations of City government. OIG achieves this mission through,

- administrative and criminal investigations by its Investigations section;
- performance audits of City programs and operations by its Audit and Program Review section;
- inspections, evaluations and reviews of City police and police accountability programs, operations, and policies by its Public Safety section; and
- compliance audit and monitoring of City hiring and human resources activities by its Compliance Unit.

From these activities, OIG issues reports of findings and disciplinary and other recommendations to assure that City officials, employees, and vendors are held accountable for violations of laws and policies; to improve the efficiency, cost-effectiveness government operations and further to prevent, detect, identify, expose and eliminate waste, inefficiency, misconduct, fraud, corruption, and abuse of public authority and resources.

OIG's authority to produce reports of its findings and recommendations is established in the City of Chicago Municipal Code §§ 2-56-030(d), -035(c), -110, -230, and 240.

PROJECT TEAM

Dana Westley, Performance Analyst Joy Brown, Compliance Officer
Rory McHale, General Counsel Jonneida Davis, Chief Compliance
Officer Robert Owens, Chief Performance Analyst

PUBLIC INQUIRIES

Communications: (773) 478-8417 | communications(Siigchicago.org <http://Siigchicago.org>

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