



CITY OF CHICAGO
OFFICE OF INSPECTOR GENERAL

20
24

Processing the Backlog of Background Investigations for Chicago Police Department Applicants

April 8, 2024

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Acronyms

CPD	Chicago Police Department
HRB	Human Resources Board
MCC	Municipal Code of Chicago
OIG	City of Chicago Office of Inspector General
OPSA	Office of Public Safety Administration
PHQ	Personal History Questionnaire

I | Background

Pursuant to the Municipal Code of Chicago (MCC) §§ 2-56-030 and -230, the City of Chicago Office of Inspector General (OIG) has conducted an inquiry concerning a large volume of unprocessed routine background investigations for individuals applying for employment with the Chicago Police Department (CPD or the Department). OIG reviewed the Office of Public Safety Administration's (OPSA) policies and practices relevant to the processing of background investigations for CPD applicants and the Police Board's (the Board) rules and practices for processing appeals from CPD applicants who are disqualified due to OPSA's findings during their background investigations. The objectives of this inquiry were to identify factors that have contributed to the current backlog of unprocessed background investigations, OPSA's plans for addressing the backlog and otherwise optimizing the background investigation stage of the hiring process, and whether the backlog of background investigations has impacted CPD's stated goals of diverse hiring.

A | CPD's Background Investigation of Applicants for Employment

Individuals wishing to become CPD members must complete an application with the City of Chicago and successfully navigate a multi-stage hiring process managed by OPSA.¹ The hiring process includes many stages, including a written standardized entrance examination, physical fitness testing, drug testing, a polygraph examination, a background investigation, medical and psychological examinations, and reviews of candidate qualifications. Applicants may be eliminated during this process for a variety of reasons, including failing to appear, withdrawing themselves from consideration, or receiving disqualifying results, such as in the background investigation stage.

Before a candidate's background investigation begins, they must submit to fingerprinting and complete a lengthy Personal History Questionnaire (PHQ), in addition to providing other supporting documentation.² The PHQ consists of ninety-four questions pertaining to the candidate's personal history including biographical information, marital status, citizenship status, education history, identification of immediate family members, residential history since age 13 — including roommates, references, employment history, criminal background, drug usage, and driving history. Once received, OPSA provides batches of candidate documentation to Kentech, a private vendor contracted with the City to complete background investigations for CPD applicants. Kentech's background investigation process includes a review of candidate documents, a home interview with the candidate, a review of employment history, and a criminal background check. Kentech's investigation typically takes one month to complete, after which Kentech provides the findings of its investigation to OPSA. In some cases, OPSA investigators will conduct the background investigation instead of outsourcing it to Kentech; this is referred to as a "ground up" investigation. OPSA reported to OIG that it will conduct a "ground up" investigation to save vendor costs in a variety of circumstances, for instance if an applicant's preliminary fingerprint results indicate a

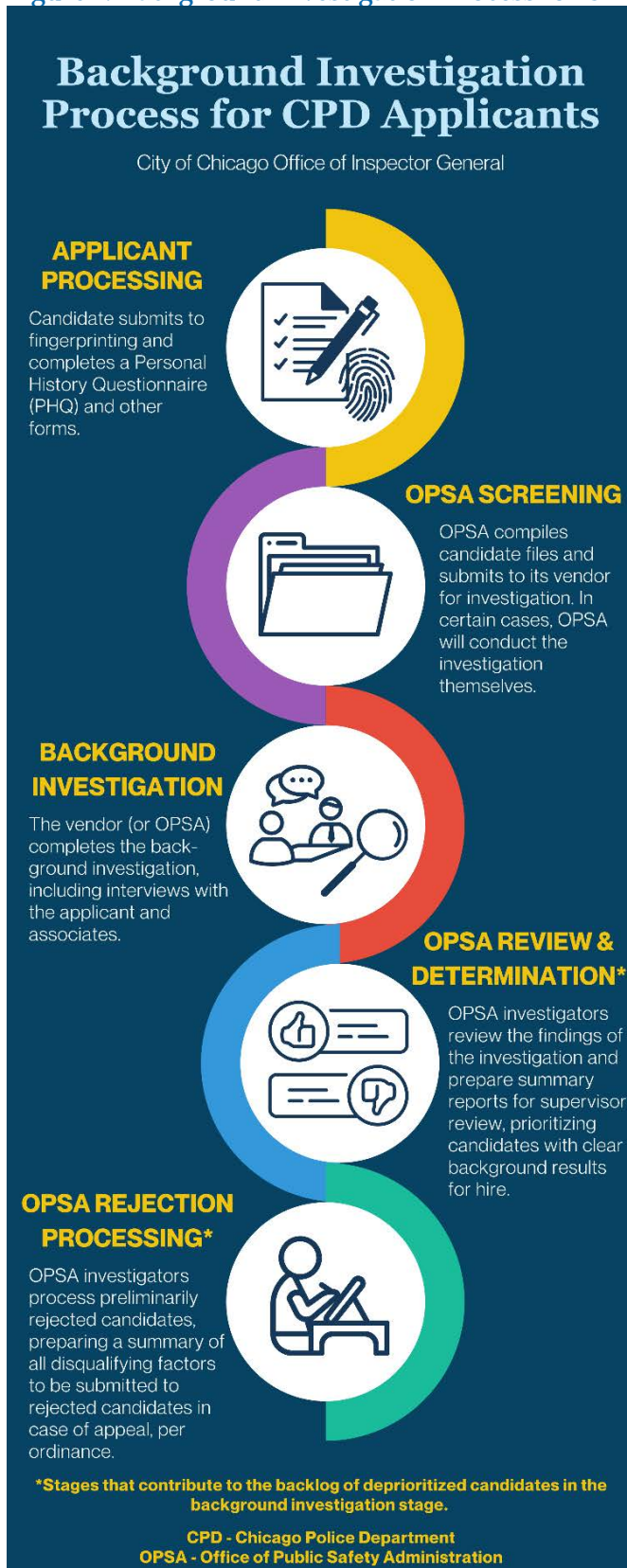
¹ In 2019, OPSA was established to centralize administrative operations for the City's public safety agencies. At that time, operations and personnel for CPD hiring, formerly under CPD's Human Resources Division, began to transition to OPSA.

² As of 2021, other required documents included, 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.

permanently disqualifying factor such as a previous felony conviction.³ During the pendency of the background investigation, candidates must separately submit to a polygraph examination. Once the background investigation and polygraph results are complete, OPSA investigators then process candidate files by examining the results of Kentech's or its own investigation, reviewing the polygraph results, conducting additional inquiries or interviews as needed, and making final summary recommendations which are submitted by the investigator to a supervisor for approval.

³ CPD's website states that "Applicants will be disqualified from consideration for a police officer position if there is evidence that the applicant has engaged in criminal conduct, even if the applicant was never convicted of a criminal offense" and lists "Conduct Involving a Felony" as a disqualifying factor. Chicago Police Department, "Background Investigation for Prospective Applicants," accessed September 1, 2023, <https://home.chicagopolice.org/bethechange/background-investigation/>.

Figure 1. Background Investigation Process for CPD Applicants



B | Diversity in CPD Hiring and Retention

As reported in OIG's Evaluation of the Demographic Impacts of the Chicago Police Department's Hiring Process ("Hiring Report"), the demographic makeup of candidates who apply to CPD differs from the makeup of candidates who are ultimately hired; the rate at which candidates succeeded in navigating the lengthy hiring process varied by candidate race/ethnicity and gender.⁴ Specifically, OIG found that Black candidates comprised 37% of the initial applicant pool but just 18% of candidates ultimately invited to the CPD's Academy, a 19-percentage point drop in representation throughout the hiring process. Female candidates also experienced a decrease in representation throughout CPD's hiring process, comprising 34% of the initial applicant pool and 27% of candidates invited to the Academy. OIG identified the background investigation as one stage in the hiring process that contributed most to the disproportionate attrition of Black candidates during the hiring process.⁵

Meanwhile, the representation of Black members within the Department at-large is likely to diminish over time, with over one-third of current Black members nearing or at retirement age.⁶ CPD created a Recruitment and Retention team in July 2021 to address, among others, concerns about diversity in its workforce.⁷ In an October 2022 City Council hearing on CPD's 2023 budget, then-Superintendent David Brown noted recent efforts made by a Recruitment and Retention team, but did not discuss efforts concerning diversity specifically. A high-ranking CPD member also testified, stating that the Department was considering a mentorship program aimed at boosting retention in addition to potential hiring incentives.

C | CPD Applicant Appeal Process for Background Rejections

CPD applicants who are disqualified from eligibility for hire due to the results of the background investigation have an opportunity to appeal their disqualification. Prior to 2019, the City's Human Resources Board (HRB) held hearings on all appeals of background investigation disqualifications, which included testimony and evidence. In November 2019, City Council amended MCC § 2-84 to transfer the appeals process to the Police Board. According to the amended ordinance, rejected applicants "shall be given written notice by the Department of the Department's decision to remove the applicant from the eligibility list, along with the reason(s) for the disqualification decision," and may, "no later than 60 calendar days from the date on the notice, appeal the decision of the Department by filing with the Board a written request."⁸ The Board may assign an appeal to a hearing officer who reviews all filings associated with the appeal and renders findings and recommendations to the Board to make a final determination. The Board's final findings are issued in writing to the applicant and posted on its website within five business days of being issued. If the

⁴ City of Chicago Office of Inspector General, "Evaluation of the Demographic Impacts of the Chicago Police Department's Hiring Process," July 8, 2021, accessed December 8, 2022, <https://igchicago.org/2021/07/08/evaluation-of-the-demographic-impacts-of-the-chicago-police-departments-hiring-process/>.

⁵ The standardized entrance examination and the physical fitness examination stages also contributed to the decrease in the number of Black candidates in the candidate pool.

⁶ As of July 3, 2023, 33% of Black or African American sworn CPD members were age 50 or older. City of Chicago Office of Inspector General, "Sworn CPD Member Overview," accessed August 3, 2023, <https://informationportal.igchicago.org/chicago-police-department-active-sworn-officer-overview/>.

⁷ Stephanie Casanova, "As CPD makes changes to increase diversity, a former candidate questions department's seemingly unforgiving hiring process," *Chicago Tribune*, September 7, 2021, accessed January 19, 2022, <https://www.chicagotribune.com/news/breaking/ct-chicago-police-diversity-hiring-20210907-n66oh2qsgnepletmxiweczlm-story.html>.

⁸ MCC §§ 2-84-035(b)(1)-(2).

Board reverses OPISA's findings of the background investigation, the candidate must be restored to the hiring eligibility list and returned to complete the hiring process.

As reported to OIG by the Police Board, one major distinction between the former HRB appeals process and the latest procedure for the Police Board is that the Board does not conduct live hearings. Instead, candidates now submit a paper appeal to the Board. The Board reported that City Council's main reasoning behind the transition was to expedite the appeals process, formerly conducted through a live hearing. Between October 2021 and March 2024, the Board decided on 65 CPD candidate appeals; they affirmed 52 rejections and reversed 13 rejections, ordering the candidates be restored to the eligibility list for hire.⁹

D | Equity Concerns in CPD's Background Investigation

In 2020, OIG received a complaint from a CPD applicant who reported experiencing a years-long delay before receiving notice of the results of their background investigation. This complaint raised equity concerns about the substantial delays in processing CPD candidates with rejected background results. Specifically, the complainant turned 40 years old while awaiting notice regarding the status of their background investigation and therefore became ineligible for hire with CPD, as recruits are not admitted to the Academy after their 40th birthday.¹⁰ The candidate therefore aged out of eligibility for hire without ever receiving a decision on their application or having had the opportunity to appeal the results of their background investigation.

At the conclusion of the background investigation, OPISA provides rejected candidates: (1) a notice of their rejection and right to appeal and (2) a background summary report that details the specific items in a candidate's background on which OPISA based its disqualification. This notice informs the rejected candidate of the results of the background investigation and triggers a 60-day window in which the candidate can appeal OPISA's determination. Because candidates cannot initiate the appeals process until receipt of the rejection notice, delays in processing background investigations affect the timing and rate at which candidates can appeal the results of their background investigation. Some candidates who might have sought an appeal if notified within six months to a year of their application, may elect not to as a result of the extensive delays, whether it be discouragement, loss of interest, attainment of new employment, or otherwise. Further, some candidates may never receive an appeals notice as a result of OPISA's recent efforts to clear the backlog, where OPISA closes out applications for candidates who fail to respond to a letter of continued interest sent years after their initial application. By delaying—or in some cases in effect eliminating—avenues for appeal, there exists a risk of denying candidates their right to appeal under the amended ordinance.

In connection with the complaint made to OIG, this inquiry examines the factors that have contributed to extensive delays in OPISA's processing of background investigations for CPD

⁹ The Police Board reported to OIG that it did not begin hearing appeals for CPD background disqualifications until July 2021, despite the amendment to MCC §§ 2-84-035(b)(1)-(2) in November 2019. OPISA Director Robert Landowski reported to OIG that at the time of the amendment, there were candidates already in the process of appeal with the HRB who were allowed to see their appeal through under the former HRB appeals process. Further, the creation of OPISA—also in November 2019—and subsequent transition of CPD-HR responsibilities, in combination with the CPD hiring freeze at the onset of the COVID-19 pandemic, may have contributed to the delay in the transition to the new appeals process. Chicago Police Board, "CPD Applicant Appeals, Findings and Decisions" accessed April 1, 2024, https://www.chicago.gov/city/en/depts/cpb/provdrs/cpd_applicant_appeals.html.

¹⁰ MCC §§ 2-152-410(e).

applicants and whether demographic trends exist among the pool of candidates that are substantially delayed in the background investigation stage. This inquiry does not evaluate the background investigation disqualification criteria for CPD candidates nor evaluate those standards for equity implications. However, previous CPD applicants have expressed concern about the equity of CPD's disqualifying standards, and OIG separately found that the background investigation stage in the hiring process disproportionately disqualifies Black candidates.¹¹

¹¹ Stephanie Casanova, "As CPD makes changes to increase diversity, a former candidate questions department's seemingly unforgiving hiring process," September 7, 2021, accessed May 26, 2023, <https://www.chicagotribune.com/news/breaking/ct-chicago-police-diversity-hiring-20210907-n66oh2gsqnepletmxliiweczlm-story.html>.

"Police Applicants Sue City, Claiming Discrimination In Hiring," *CBS News Chicago*, June 4, 2013, accessed June 16, 2023, <https://www.cbsnews.com/chicago/news/police-applicants-sue-city-claiming-discrimination-in-hiring/>.

City of Chicago Office of Inspector General, "Evaluation of the Demographic Impacts of the Chicago Police Department's Hiring Process," pp. 28, July, 8, 2021, accessed December 8, 2022, <https://igchicago.org/2021/07/08/evaluation-of-the-demographic-impacts-of-the-chicago-police-departments-hiring-process/>.

II | Analysis

A | Hiring demand for Police Officers, limited OPSA staff, and time-intensive administrative processing for background investigations contribute to the large volume of unprocessed applicants at the background investigation stage.

OIG found that 2,400 applicants who took CPD's entrance examinations between 2016 and 2018 remained pending at the background investigation stage as of May 2021. In a report published in July 2021, OIG found that 4,020 applications from the 2016 to 2018 hiring pools did not advance beyond the background investigation stage. In other words, nearly 60% of all applications that terminated at the background stage had not received a formal rejection notice by Spring 2021, between three to six years after candidates initially applied. OPSA reported to OIG that most applications in this backlog have background results that are apparently disqualifying and are awaiting processing by OPSA investigators, which includes drafting a summary report detailing each disqualification reason to withstand appeal, should the candidate elect to pursue it.

2,400

CPD applications from 2016-2018 remained pending at the background stage in May 2021.

60%

of CPD applications from 2016-2018 that terminated in the background stage were still not finalized by May 2021.⁹

OPSA reported to OIG that the agency's priority is hiring qualified Police Officers and moving viable candidates through the process as efficiently as possible. This results in a de-prioritization of applicants with apparently disqualifying results, which can happen both at the outset of case assignment for processing by OPSA investigators and throughout background processing. Specifically, an OPSA supervisor screens the investigation results from Kentech and assigns OPSA investigators cases, prioritizing candidates whose files do not contain apparently disqualifying results. Viable candidates are once again prioritized throughout the course of an investigator's work; should an investigator discover disqualifying items in assessing Kentech's summary report, the polygraph results, or conducting follow-up investigative work, the investigator will put the processing of the applicant aside, and prioritize processing the background for a candidate with clear background results to submit for supervisor approval. OPSA reported to OIG that investigators are expected to continue processing other background investigations after or in between the processing of candidates with apparently acceptable background results.

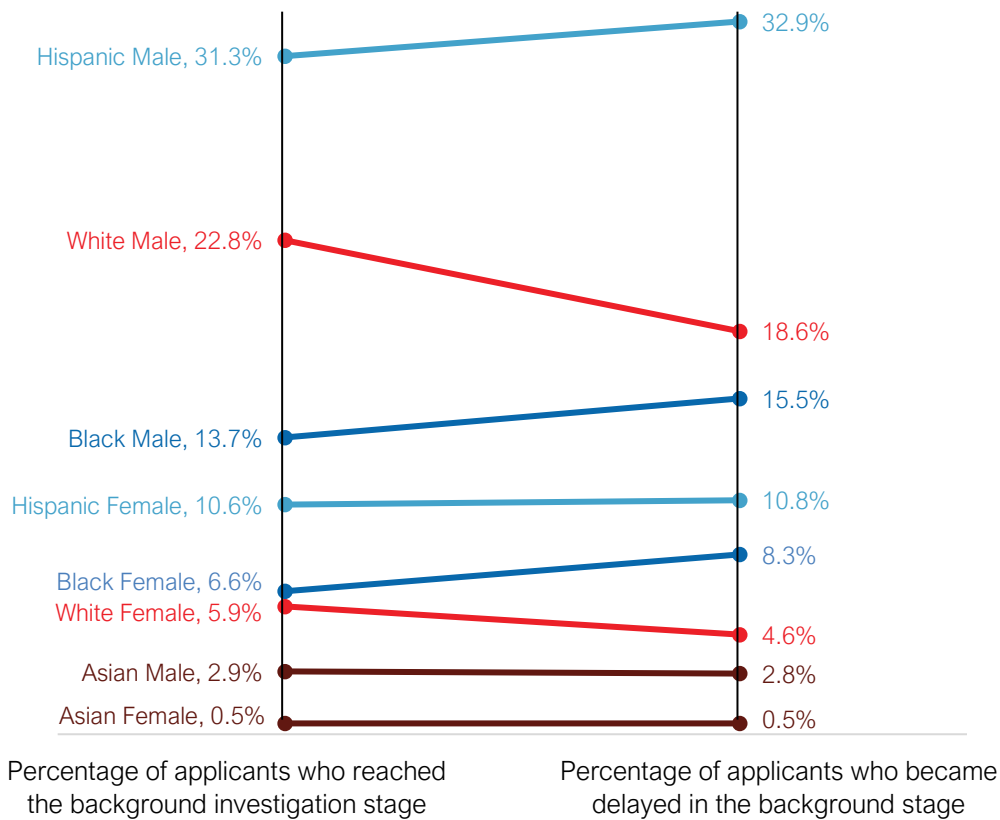
¹² OIG uses "terminated" to describe applications that did not advance beyond a certain stage in CPD's hiring process. An employment application can terminate in the background investigation due to being disqualified, withdrawing from the process, or becoming delayed in the backlog.

Limited OPSA staff and the expansive documentation and reporting required for background investigations, particularly backgrounds preliminarily identified for disqualification, contribute to the delayed CPD applicant background investigation process. Whether qualifying or disqualifying, all applicant background investigation findings are submitted from the assigned investigator to a single OPSA supervisor for review. For applicants that qualify for hire at that stage, OPSA will advance them to the final steps of the hiring process, including a final fitness test, prior to entrance into the Academy. For disqualified applicants, OPSA investigators must draft a summary report detailing the findings of the applicant's background investigation and the relevant disqualifying background standards, which are also submitted for review by the same single OPSA supervisor. This summary is included with the letter sent to the applicant informing them of their disqualification and their right to appeal. OPSA reported to OIG that the summaries for rejected applicants must be specific and thorough in order to withstand scrutiny in case of an appeal. While this likely improves the thoroughness of investigations for rejected candidates, it reportedly adds significant time to the processing of candidates with apparently disqualifying background results. As of June 2, 2023, OPSA had 16 active employees in the role of Investigator to conduct this work, with one supervisor to review all investigators' findings.

B | OIG found that white applicants were less likely to become delayed in the background investigation stage than non-white applicants.

For purposes of this analysis, OIG compared the demographic makeup of the pool of applicants that had advanced to the background investigation stage in CPD's hiring process to the demographic makeup of the subset whose applications remained pending in the background stage years after taking the written standardized examination. While no single racial or ethnic group or gender identity was more likely to be represented in the backlog of pending background investigations, OIG found that white candidates comprised a smaller proportion of the backlog cohort than they did of applicants who originally entered the background stage of the hiring process (Figure 2 below). Specifically, white male applicants comprised 22.8% of candidates who reached the background stage in the process from the 2016 to 2018 entrance examinations, but comprised just 18.6% of candidates whose background investigations remained pending as of May 2021. White female candidates were also less likely to remain pending at the background stage, comprising 5.9% of candidates who reached the background check stage, and 4.6% of those who remained pending. All other groups were either proportionally- or over-represented in the backlog cohort as compared to the pool at the outset of the background investigation stage. Most notably, Black male, Black female, and Hispanic male candidates were represented in the backlog at slightly higher rates than they were at the outset of the background investigation stage.

Figure 2. Gender and race/ethnicity for all candidates from the 2016 to 2018 hiring pools who reached the background investigation stage compared to those who were delayed in the investigation stage of the hiring process as of May 2021¹³



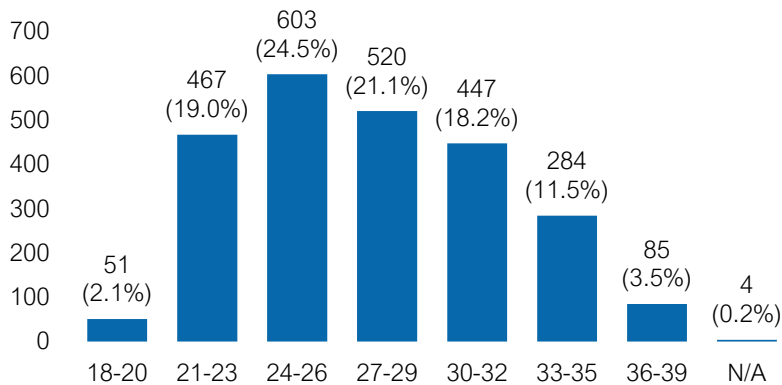
Source: OIG Analysis

Further, OIG did not find any evidence of disparity by age for candidates with applications delayed in the backlog, with candidates in the backlog cohort having an average age of 27 years old at the time of their initial application (Figure 3 below). While OIG did not find evidence of age as a factor among candidates whose applications become trapped in the backlog, there is still a concern that some candidates may turn 40, aging out of eligibility, before being notified of the outcome of their background investigation or having the opportunity to appeal. While accounting for just 3.5% of delayed background investigations, most applicants in the 36- to 39-year-old age group would have aged out of eligibility by the time of this analysis in May 2021. This concern could be greater for non-white candidates, as OIG found that Black male, Black female, and Hispanic male candidates comprised a greater proportion of candidates with delayed background checks than candidates who reach the background stage overall, while white candidates comprised a smaller proportion of the backlog than they did of all background investigations (Figure 2 above). The Police Board reported to OIG that the Board is aware of the backlog and the concerns of applicants aging out of

¹³ Of applicants who reached the background investigation stage, 5.7% identified as demographic categories other than those reported here, such as two or more races, Indian Native, Pacific Native for race/ethnicity or did not disclose their race/ethnicity, gender, or both categories. For applicants who became delayed in the background stage, 6% identified as demographic categories other than those reported here. Further, OIG recognizes the distinction between sex and gender identity, and the distinction between race and ethnicity. OIG relies upon the categories in which CPD collects its data throughout this analysis.

eligibility while awaiting background investigation results or while awaiting appeal; the Board reportedly intends to prioritize appeals where the applicant would turn 40 years old within one year of submission of their appeal, based on the birthdate of the applicant provided on the appeal documents.

Figure 3. Age of candidates from 2016 to 2018 whose applications were delayed at the background investigation stage of the hiring process as of May 2021¹⁴



Source: OIG Analysis

C | OPSA's Recent Efforts to Address the Background Investigation Backlog

Since the period of analysis, OPSA reported to OIG that it has undertaken efforts to process the large volume of applicants in the backlog for the background investigation stage of the CPD hiring process. OPSA reported to OIG that it:

1. Resumed processing of background summary reports and notices of appeal now under the Police Board for preliminarily rejected applicants who remained in the backlog from 2016 through 2018 hiring examinations in May 2021, previously paused during the formation of OPSA and the COVID-19 hiring freeze;
2. Began sending applicants who remained in the background investigation backlog for several years an email to determine whether applicants remained interested in employment with CPD, in order to close applications for those who did not respond within 21 days and to prioritize processing of the backlog for candidates who responded;¹⁵
3. Had nearly finished processing all background investigations for candidates who sat for the 2016 examinations, as of December 2022; and
4. Processed a substantial number of rejections in September 2022 from present-day hiring pools, so as to not increase the number of applications pending processing in the backlog.

¹⁴ OIG reports here 2,461 unique candidate ages at the time of initial application, a sum greater than the count of unique candidates in the backlog. Because a single candidate could have applied multiple times during the period of analysis, at which time the candidate's age might have changed, the counts reported here are of unique candidate ages at the time of each application made, and not of unique individuals.

¹⁵ CPD candidates who are rejected based on the background investigation are provided 60 days to appeal their rejection with the Police Board. MCC §§ 2-84-035(b)(1)-(2).

OPSA's efforts show promise for combatting the growing backlog of pending background investigations, but do not eliminate concerns, as many background investigations still await processing. OPSA prioritizes candidates with a *qualifying* background recommendation for processing. However, the main consequence of this is that there is a substantial delay or complete failure to notify candidates with *disqualifying* background results who could appeal to the Police Board and potentially reverse the initial disqualification determination. Because some candidates are not being afforded their right to appeal in a timely manner—or sometimes ever—it is not possible to know the number of additional candidates who might have pursued appeal had they not experienced considerable delays in receiving their background summary report. Further, candidates who might have advanced past the background investigation after a complete review may also become delayed in the backlog, as candidates are set aside based on OPSA's preliminary review of apparently disqualifying results in the background investigation. Despite the preliminary review, OPSA investigators still must review these results and ensure they meet the criteria under CPD Special Order 18-01, "Pre-Employment Disqualification Standards for Applicants for the Position of Police Officer."¹⁶

D | Areas of Consideration in Resolving the Background Investigations Backlog

Based on the analyses reported here, OIG identifies the following areas of consideration for OPSA's ongoing efforts to address the substantial backlog of CPD candidates who remain pending in the background investigation stage:

1. Solutions to manpower constraints for processing and reviewing background investigations (such as hiring or assigning additional OPSA investigators and supervisors to aid in the processing of background summary reports);
2. Standard operating procedures to establish mandatory time periods for processing background investigations for CPD applicants and expediting parts of the background investigation process where possible, for example by not investigating further disqualifying factors for applicants with prior felony convictions; and
3. Prioritization of processing of background investigations in the backlog for individuals who are nearing 40 years old.

¹⁶ CPD Special Order 18-01, "Pre-Employment Disqualification Standards for Applicants for the Position of Police Officer" is not publicly available, as CPD has reported to OIG that it contains confidential operational information. A public listing of disqualifying factors for the background investigation can be found on CPD's website. Chicago Police Department, "Background Investigation for Prospective Applicants," accessed June 2, 2023, <https://home.chicagopolice.org/bethechange/background-investigation/>.

III | Conclusion

The greatest risks of OPESA's years-long delays in processing CPD applicants with apparently disqualifying background investigation findings include overlooking qualified candidates for hire due to initial apparently disqualifying results and denying rejected candidates the right to appeal, as is now afforded to them by ordinance. Further, as found in this analysis, non-white applicants are more likely to become delayed in the backlog of background investigations than white applicants, increasing the risk for the inequitable impact of CPD's hiring process. Similarly, the risk is greater for candidates nearing age 40 whose background investigation falls into the backlog, as they may become ineligible for hire awaiting the results of their background investigation, independent of what their background or appeal findings might have been. Moreover, the legitimacy of the appeals process is weakened when the processing of background investigations is allowed to languish. To give the Police Board appeals process sufficient meaning and purpose, it is critical that CPD applicants have a reasonable opportunity to participate in the appeals process without excessive delays that may cause them to lose eligibility under the minimum age requirement, interest, or means to await a hiring decision for multiple years. It cannot be known how many candidates in the background investigation backlog may currently qualify for hire but are awaiting processing, or might have sought and subsequently prevailed in an appeal of the disqualification of their application in the absence of such delays.

Appendix A | OPSA and CPD Response¹⁷



CITY OF CHICAGO

OFFICE OF PUBLIC SAFETY ADMINISTRATION

VIA EMAIL

March 22, 2024

Deborah Witzburg, Inspector General
Office of Inspector General
740 N. Sedgwick, Suite 200
Chicago, IL 60654

Dear Inspector General Witzburg:

Thank you for your inquiry concerning the backlog of background investigations process conducted by the Office of Public Safety Administration (OPSA) for candidates applying for employment with the Chicago Police Department (CPD). OPSA and CPD submit this letter in response to the related draft report.

Initially OPSA and CPD would note that the background investigation backlog that existed from 2016-2021 was due to the City's collective focus on prioritizing viable candidates for hire and moving those individuals through the background process, as well as limited investigative staff, and the formation of OPSA amid the COVID-19 pandemic.

OPSA continues to make strides with adjudicating its background files and sending timely communication to applicants regarding adverse employment decisions. We are currently staffed with 15 civilian investigators and are actively taking steps to fill 5 additional vacancies in the second quarter of 2024. Additionally, it has always been our practice to conduct "Ground Up" investigations for viable candidates who may be close to aging out of the process.

OPSA and CPD have been and continue to be committed to continuously reviewing the background standards for prospective CPD Police Officer candidates in an effort to eliminate potential barriers in the hiring process. To that end, OPSA and CPD revised the background standards in 2021 which are reflected in OPSA Special Order No. 21-01. These standards include a shorter "look back" period for certain levels of criminal offenses and broadens the scope of "acceptable use of cannabis" to align with the current applicable laws, and a streamlined process for applicants and the background investigation process.

The draft report states that the Police Board has posted "just 12 decisions for CPD candidates appealing the findings of their background investigations." This number is not indicative of the number of applicants who have elected not to appeal, nor does it adequately capture the determinations previously made by the Human Resources Board, the predecessor to the Police Board.

Lastly, in partnership with our background vendors, CPD's polygraph unit, and OPSA's Medical section, we look forward to the upcoming launch of our newly developed applicant tracking tool. We realize the importance of accurate data collection and record maintenance and it is our hope that this tool will allow our investigative leadership to better track candidate files while also providing candidates with updates regarding their candidacy in real time. We look forward to enhancing our technological capabilities, which allow us to continue to increase transparency in the hiring process.

3510 SOUTH MICHIGAN AVENUE, CHICAGO, ILLINOIS 60653



CITY OF CHICAGO



OFFICE OF PUBLIC SAFETY ADMINISTRATION

Sincerely,

A handwritten signature in blue ink, appearing to read "Joy Brown".

Joy Brown
Director of Human Resources
Office of Public Safety Administration

A handwritten signature in blue ink, appearing to read "Scott Spears".

Scott Spears
Acting General Counsel
Chicago Police Department

3510 SOUTH MICHIGAN AVENUE, CHICAGO, ILLINOIS 60653

¹⁷ In a draft report provided to the agencies, OIG reported that the Police Board had posted 12 decisions it made through January 2023 on CPD applicant appeals. The Board subsequently updated its website with appeals decisions made from March 2023 to March 2024. Page 6 of this report indicates the 65 publicly posted CPD applicant appeals decisions as of April 1, 2024.

Appendix B | Police Board Response



CITY OF CHICAGO

CHICAGO POLICE BOARD

March 13, 2024

VIA E-MAIL

Tobara Richardson
Deputy Inspector General for Public Safety
Office of Inspector General
City of Chicago
trichardson@igchicago.org

Deputy Inspector General Richardson:

Thank you for forwarding a draft of the Office of Inspector General's report "Processing the Backlog of Background Investigations for Chicago Police Department Applicants." We are writing to provide additional information that we believe will be useful to include in the report.

An applicant who is removed from the eligibility list due to the results of a background investigation has 60 days to file an appeal with the Police Board. The Municipal Code of Chicago gives the Office of Public Safety Administration 45 days to file a response to the appeal, and the applicant then has 30 days to file a reply to the response. These filings are then forwarded to a Police Board appeals officer, who thoroughly reviews them and presents detailed written findings and a recommendation to the Board. At its monthly public meeting, the Board makes the final decision on each appeal. The written decision is then issued to the parties and posted on the Board's website.

The Board decides appeals expeditiously. From January 2023 through February 2024, the Board decided 54 appeals, taking an average of 62 days from the final filing deadline to issuing a written decision.

We recognize the importance of keeping delays in processing CPD applicants to a minimum, and the Board is committed to continuing to decide appeals in a timely manner. Thank you for your consideration of the above information.

Sincerely,

Handwritten signature of Kyle Cooper in black ink.

Kyle Cooper
President

Handwritten signature of Paula Wolff in black ink.

Paula Wolff
Vice President

Handwritten signature of Max Caproni in black ink.

Max Caproni
Executive Director

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Director of Diversity, Equity, and Inclusion

The City of Chicago Office of Inspector General 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'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.

For further information about this report, please contact the City of Chicago Office of Inspector General, 740 N. Sedgwick Ave., Suite 200, Chicago, IL 60654, or visit our website at igchicago.org.

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