

Workgroup to Implement the SAFE-T Act Policing Provisions

Preliminary Assessment
Report on Implementation

2025

ILJP
Illinois Justice Project

C E P P
Center for
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Public Policy



Thank you to the Joyce Foundation and an
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Workgroup.

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April 8, 2025

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List of Abbreviations

ALJ	Administrative Law Judge
BWC	Body-worn camera
BWC Act	Illinois Law Enforcement Officer-Worn Body Camera Act
CEPP	Center for Effective Public Policy
CESSA	Community Emergency Services and Support Act
CIT	Crisis Intervention Team
COPS	Community Oriented Policing Services
DCRA	Death in Custody Reporting Act
DOJ	United States Department of Justice
FBI	Federal Bureau of Investigation
FOIA	Freedom of Information Act
IACP	International Association of Chiefs of Police
ICJIA	Illinois Criminal Justice Information Authority
IDHS	Illinois Department of Human Services
IDOC	Illinois Department of Corrections
IDOC JDSU	Illinois Department of Corrections – Jail and Detention Standards Unit
ILACP	Illinois Association of Chiefs of Police
ILETSB	Illinois Law Enforcement Training and Standards Board
ILJP	Illinois Justice Project
ISP	Illinois State Police
ISP UCR	Illinois State Police Uniform Crime Reporting
MTU	Mobile training unit
NCSL	National Conference of State Legislatures
NEMRT	Northeast Multiregional Training
NIBRS	National Incident-Based Reporting System
PERF	Police Executive Research Forum
SAFE-T Act	Safety, Accountability, Fairness and Equity-Today Act
VR	Virtual reality

Letter from the Illinois Justice Project

In 2021, when Public Act 101-0652, also known as the SAFE-T Act (Safety, Accountability, Fairness, and Equity-Today Act) was enacted in Illinois, trust and legitimacy in the police had been lost for many Illinoisians and indeed many across the country. The loss of trust that was already present in communities most impacted by crime and violence crystallized in the wake of the police murder of George Floyd as mass protests across the country demanded police reform. It was in this context that the SAFE-T Act was enacted in 2021 and amended three times through 2022. By enacting the SAFE-T Act's policing provisions, the Illinois General Assembly and Governor J.B. Pritzker established that it was in the public's best interest to enshrine into law principles and measures that promote legitimate and effective policing: Law enforcement transparency and accountability; improved training and officer well-being and increasing community trust and respect, which are necessary for police and community collaboration to solve and prevent crimes. The SAFE-T Act was among the most sweeping criminal legal system reforms enacted in Illinois history, which underscores the heightened importance of its successful implementation.

Public policy implementation is the process by which a government decision (a law in this case) is put into action. Effective implementation requires stakeholders on all sides of an issue to join one another at the table, roll up their sleeves, and work together in good faith to achieve the common goal of actualizing the law. To that end, the Workgroup to Implement the SAFE-T Act Policing Provisions was convened in February 2024, co-chaired by the SAFE-T Act's champions in the state legislature – Senator Elgie R. Sims, Jr., Senator Robert Peters, and Representative Justin Slaughter. The Workgroup's membership includes: Illinois Attorney General Kwame Raoul; representatives from the offices of Governor J.B. Pritzker and Lt. Governor Juliana Stratton; leadership and staff from the Illinois Law Enforcement Training and Standards Board (ILETSB), Illinois State Police, and the Illinois Criminal Justice Information Authority; police leaders and stakeholders from across the state; advocates; and academics.

The findings in this report paint a picture of a law whose implementation is still a work in progress. Of the provisions referenced in this report, there is not 100% compliance in any single area. And the report makes clear that there are many contributing factors for the lagging compliance.

Among the findings:

- Low compliance rates with the mandated reporting of mental health dispatches, use of force incidents, and deaths in custody.
- Delays and challenges with the implementation of the discretionary decertification provision, which created a new accountability process to revoke certification from law enforcement officers who have engaged in misconduct. From 2022 through March 2025, the Illinois Law Enforcement Training and Standards Board (ILETSB) received 504 notices of alleged officer misconduct violations. None has progressed to an official complaint for discretionary decertification.
- While body-worn cameras are in widespread use and a majority of agencies report they have sufficient cameras for their officers, law enforcement agencies also reported barriers to meeting the SAFE-T Act's requirements, including the cost of cameras, the cost of data storage, and the lack of personnel capacity to review footage and respond to Freedom of Information Act (FOIA) requests.
- ILETSB awarded grants to the majority of law enforcement agencies that requested funding for body-worn cameras in 2024, dispensing \$9.9 million in grant funding. However, these awards represent only 30% of ILETSB's \$33 million allocation for body-worn camera grants (ILETSB intends to issue requests for proposals for the remainder of these funds in future years). Only 212 agencies applied for funding and not all funds were utilized due to various barriers such as agencies failing to meet grant requirements or withdrawing from the application process.
- Since our assessment, there have been notable developments, including legislative changes aimed at expanding ILETSB's resource allocation requirements for body-worn cameras and improving law enforcement training practices, such as ILETSB's partnership with the Department of Justice's Office of Community Oriented Policing Services (COPS Office) and the COPS Training Portal to offer free online training for law enforcement officers across the state.

In addition to the select findings cited above, the report leaves us with several questions which remain unanswered. Among them:

- Which state agency will ensure that law enforcement agencies properly document and share with the public reports about: deaths in custody, use of force incidents that result in death or serious injury, and mental health dispatches?
- How will access to police trainings and curricula be improved?
- When will the discretionary decertification rules be promulgated and implemented?

The Workgroup to Implement the SAFE-T Act Policing Provisions will recommend answers to these questions and more in the next phase of the implementation process. And it should not be forgotten that the SAFE-T Act called on state and local law enforcement agencies to engage in new activities that require capacity and resources to implement at-scale. Perhaps the most obvious of these agencies is the Illinois Law Enforcement Training and Standards Board. In Fiscal Year 2021, when the SAFE-T Act was enacted, ILETSB's total budget was \$27.5 million. By Fiscal Year 2024, just three years later, ILETSB's budget had grown sixfold to \$167.7 million thanks to resources appropriated by the legislature and Governor to effectuate certain provisions in the SAFE-T Act.

I am grateful to the co-chairs for convening this group and our partners at the Center for Effective Public Policy who facilitated this Workgroup, for the dedication of the law enforcement stakeholders, advocates and community members who have participated in the workgroup thus far. This work would not have been possible without the Joyce Foundation and an anonymous donor, who provided financial support. I am equally grateful that the implementation work will continue, allowing us to address what the findings make clear: There is significant room to improve implementation and fully realize the goals of the SAFE-T Act.

In closing, I would like to note that in July 2024, as this workgroup was underway, Sangamon County resident Sonya Massey, who reportedly had a history of mental health struggles, was shot and killed in her home by a Sangamon County sheriff's deputy responding to her 911 call. The officer has been charged with first degree murder, and his legal culpability has yet to be determined by a court. The facts that have emerged about the case spotlight opportunities for improved policing that the SAFE-T Act's policing provisions aim to address: the need for training around mental health responses and de-escalation, the importance of body-

worn camera activation, the value of effective decertification processes, as well as the profound impact such a loss of life has on all involved—and on public trust in law enforcement.

If Illinois is to deliver on true public safety that avoids such outcomes, there must be effective mechanisms in place so that the more than 800 agencies charged with providing police services are sufficiently supported and held accountable to the highest standards of policing.

Sincerely,

Ahmadou Dramé

Director

Illinois Justice Project

Executive Summary

The Safety, Accountability, Fairness and Equity-Today Act (SAFE-T Act) was enacted in Illinois in 2021 and mandated extensive criminal justice reforms across policing, the pretrial and sentencing processes, and incarceration. The law intends to increase public safety and trust between law enforcement and the community, particularly in Black communities, which have been disproportionately impacted by the criminal justice system.

In February 2024, Illinois State Senator Elgie Sims, Jr., Senator Robert Peters, and Representative Justin Slaughter formed the Workgroup to Implement the SAFE-T Act Policing Provisions to assess the implementation status of the policing provisions in the SAFE-T Act and support their implementation. The Workgroup decided to focus on five priority policing provisions: (1) Reporting, (2) Use of Force, (3) Body-Worn Cameras (BWCs), (4) Training, and (5) Decertification. The Workgroup also noted its interest in assessing the adequacy of statewide funding for these provisions.

This report is the culmination of the Workgroup's first phase of work: an assessment to gauge the implementation status of each of the priority provisions. Throughout 2024, the Workgroup engaged in several activities to conduct this assessment, including holding regular meetings, hosting presentations from national policing experts, receiving updates from Workgroup members about implementation progress, distributing a survey for law enforcement agencies, and holding a series of listening sessions for law enforcement personnel and, separately, community members.

The full report provides comprehensive context and background for each priority provision, as well as an assessment of its implementation. This Executive Summary provides a concise overview of the implementation status for each provision.

Implementation Status

Reporting

The Workgroup focused on the reporting requirements related to mental health dispatches, use of force incidents, and deaths in carceral custody. To assess the implementation of the reporting requirements, staff from the Illinois Criminal Justice Information Authority (ICJIA) examined the reporting history from 2022 and 2023 of nearly 1,000 Illinois law enforcement agencies based on those included in the National Incident-Based Reporting System

(NIBRS) database, Illinois State Police’s reporting records, and ICJIA’s death-in-custody reporting records.

For mental health dispatches and use of force incidents, ICJIA found that most agencies were either completely compliant or completely non-compliant over each 12-month calendar period. For instance, less than half of all law enforcement agencies complied with all 12 months of reporting for mental health dispatches or use of force incidents; there was a slight improvement in reporting from 2022 to 2023. A strikingly large proportion of agencies submitted no reports during the analyzed time period: between one-third and 40% of agencies submitted no reports for mental health dispatches or use of force. Around 20% of agencies submitted reports in some months and not in others (just under 20% for mental health dispatch reporting and just over 20% for use of force reporting).

ICJIA also reported that most submitted use of force reports are “zero reports,” which are formal certifications that zero use of force incidents occurred in the given month. For mental health dispatches, during most months, zero reports accounted for slightly less than half of all reports. Zero reports are required to be submitted for both use of force and mental health dispatch reporting.

Regarding deaths in custody, in 2022, ICJIA did not identify any deaths that went unreported; however, in 2023, 13% of deaths in police custody and 7% of deaths in sheriff’s custody went unreported. ICJIA is currently working on ways to improve its auditing process to identify if all deaths in custody are indeed being reported.

Based on survey results from listening sessions with a sampling of Illinois law enforcement agencies, it appears that the reasons for low compliance with the reporting requirements include confusion by law enforcement agencies about what, where, and how to report; insufficient staff capacity; and a lack of direction from any state agency on the reporting requirements. Additionally, agencies may not be aware that even when no incidents occur in a month, zero reports must be submitted for both use of force and mental health dispatch reports. Thus, it is unclear whether no incidents occurred or reporting obligations were not followed. The narrow definition of reportable use of force incidents—limited to cases involving death, serious bodily injury, or firearm discharge—contributes to the relatively low number of reported incidents and the high proportion of zero reports in monthly data.

Use of Force

The new use of force requirements in the SAFE-T Act are numerous and varied. They include: a requirement that the “totality of the circumstances” be considered when determining whether use of force is justifiable; requiring officers to “make reasonable efforts” to identify themselves and alert individuals that deadly force might be used prior to using force; prohibiting the use of deadly force based solely on an individual’s potential to commit self-harm, or against someone suspected only of committing a property offense; prohibiting use of deadly force when someone is no longer a threat to others; prohibiting chokeholds or any above-the-shoulder physical restraint that would risk asphyxiation of the held person without legal justification for the use of lethal force; restricting the use of non- or less-lethal projectiles; and creating a positive duty for police officers to render aid and a duty to intervene.

Based on survey responses and a limited review of new use of force policies that have been adopted by local law enforcement agencies, many updated policies do not comprehensively incorporate all the Act’s use of force mandates. For instance, when asked which use of force provisions were incorporated into their policies, one-third to one-half of responding agencies indicated they had not incorporated each of the use of force requirements into their policies. According to survey responses and remarks during the listening sessions, there does not seem to be sufficient or standard training on the new policies available at the agency or statewide level, making it unclear whether individual officers are positioned to implement the new use of force mandates. When rating how easy or challenging certain implementation tasks related to use of force were, respondents gave the task of “interpreting changes to use of force policies in SAFE-T Act legislation” the highest overall difficulty rating of all tasks (an average of 3.21 on a scale of 1 to 5, in which a 5 represented “extremely challenging”). While the SAFE-T Act created some guardrails in the new use of force mandates, the current assessment did not examine, and it is therefore unknown, whether the new policies are changing any behavior in the field.

Body-Worn Cameras

BWCs appear to be in widespread use and a majority of agencies report they have a sufficient number of cameras for their officers. Sixty-three of 74 responding agencies indicated in the survey that they were currently using BWCs as specified in the SAFE-T Act, and seven respondents indicated that they were “working on it.” Most agencies that responded (58 of 74) indicated their departments used BWCs before the SAFE-T Act mandate went into effect.

Based on the survey results, a top barrier to full implementation of this provision is the “lack of personnel to review footage and respond to Freedom of Information Act (FOIA) requests.” Law enforcement stakeholders also indicated in the listening sessions that fulfilling requirements for FOIA requests is the most challenging aspect of implementing this part of the law. Additionally, two of the top three barriers to meeting the BWC requirements are the costs of cameras and data storage. On average, survey respondents found securing funding for BWCs to be “moderately challenging,” rating it a 3.87 on a 1-5 scale, where 5 represented an “extremely challenging” task.

Applying for grants from the Illinois Law Enforcement Training and Standards Board (ILETSB) and local government grants were rated as having a difficulty level of 3.4 by responding agencies, while applications for federal grants from the Department of Justice rose to an average difficulty level of 3.5. ILETSB awarded grant funding to 171 agencies from the 212 that applied, totaling \$9.9 million. ILETSB was allocated \$33 million in the state fiscal year 2024 for BWC grants.

Community listening session participants valued body-worn cameras for enhancing officer accountability and deterring misconduct but raised concerns about the overall lack of transparency in their use.

Training

The SAFE-T Act established additional training requirements for both new and veteran law enforcement officers. As the state government agency responsible for promoting and maintaining a high level of professional standards for law enforcement and correctional officers, ILETSB is responsible for tracking compliance and making training available to officers statewide. Indeed, as a result of the new requirements, ILETSB and the Mobile Training Units (MTUs) have developed curricula, offered more courses, and published guidance on meeting the requirements.

Based on feedback provided during the listening sessions, the most challenging issues for officers are the availability of training courses, the process of obtaining course and staff trainer certification, and the lack of shared training curricula across agencies. Individuals described the course certification process as a bit cumbersome. Many expressed a desire for increased collaboration among ILETSB, the MTUs, and individual agencies, as well as for departments to share lesson plans so that each agency does not have to develop its own curricula.

Based on the survey results, the top four challenges for officers attempting to access training are: (1) the availability of hands-on scenario-based role-playing training (an average score of 4 out of 5), (2) complying with the number of hours required for training (an average score of 3.88 out of 5), (3) the availability of training on required topics (an average score of 3.84 out of 5), and (4) getting staff certified to provide mandated training (an average score of 3.75 out of 5). According to the survey, the most challenging required training topics to comply with are high-risk traffic stops, use of force, de-escalation techniques, and officer safety.

Community listening session participants emphasized the need for more frequent, in-depth training on cultural competence, de-escalation techniques, and crisis intervention to build trust between law enforcement and the community. They also called for greater transparency in officer training, including making training materials publicly accessible to demonstrate a commitment to community-focused standards.

The Workgroup did not review the substance of any training; therefore, this assessment does not speak to the quality of the new trainings, whether they are evidence-based, or their potential to change behavior.

Discretionary Decertification

The new decertification process under the SAFE-T Act took effect on July 1, 2022, aiming to strengthen oversight, improve accountability, and prevent agencies from unknowingly hiring officers with histories of misconduct. The most significant change to the decertification procedures was the establishment of a discretionary decertification process (an automatic process already existed). Discretionary decertification applies when an officer's conduct, though not criminal or criminally prosecuted, suggests she is unfit to serve. The SAFE-T Act broadened the types of behavior that can lead to decertification to include acts of misconduct that may not result in criminal charges (e.g., excessive use of force, failure to intervene, tampering with or concealing evidence or camera footage, committing perjury or knowingly giving false statements, and engaging in unprofessional conduct).

Implementation of the discretionary decertification process has faced delays and challenges and, as of this report's publication, has not been fully implemented. Progress includes appointing 12 of 13 Certification Review Panel members, publishing proposed Administrative Rules for public comment in October 2024, and creating Certification Counsel positions to act as prosecutors in hearings.

Since 2022 and as of March 2025, ILETSB has received 504 notices of alleged officer misconduct violations. Of these cases, 281 have been investigated and closed, with the primary reason for closure being insufficient evidence. The remaining 223 open cases are in various stages under either preliminary review or formal investigation. While some cases are ready to proceed to the next stage of the process, in which they will be filed as formal complaints, no case can move forward until Administrative Rules for the discretionary decertification hearings have been approved.

The ILETSB Public Officer Database launched on July 1, 2022, and provides public access to officer certification status and misconduct history through name-based searches; thus, its limited functionality prevents broader analysis of (de)certifications.

Community listening session participants emphasized the need for greater transparency in officer certification and misconduct tracking to build public trust. Attendees criticized the current Officer Lookup tool as too limited and called for a user-friendly, publicly accessible dashboard that regularly updates on decertification and disciplinary actions.

Next Steps

Based on the results of this assessment, it is clear that there is significant room for improvement in implementation and realization of the goals of the SAFE-T Act. Following the release of this Assessment Report, the Workgroup will collectively develop strategies and recommendations to advance implementation and ensure compliance, aligning with the underlying goals of the SAFE-T Act, including holding police accountable, reducing police misconduct, and increasing trust between law enforcement and community members.

Introduction

The Safety, Accountability, Fairness and Equity-Today Act (SAFE-T Act) was enacted in Illinois in 2021 and required extensive criminal justice reforms across policing, pretrial processes, sentencing, and corrections, with appropriations made by the Illinois General Assembly to support its implementation.¹ The law intends to increase public safety and trust between law enforcement and the community, particularly in Black communities, which have been disproportionately impacted by the criminal justice system.² The final version of the SAFE-T Act was 764 pages in length and contained dozens of provisions ranging from ending the suspension of driver's licenses for unpaid fines to amending Illinois's definition of felony murder.³ While the portion of the SAFE-T Act related to pretrial release received the most attention both nationally and locally,⁴ the SAFE-T Act also required significant reforms to policing practices and police accountability measures. The policing reforms include, among others:

- Expanded training requirements for police officers
- Changes to the use of force standards
- A requirement that all law enforcement officers employ body-worn cameras (BWCs)
- New reporting requirements on use of force and deaths in custody
- New police decertification processes
- New databases to track police misconduct

The SAFE-T Act became law on February 22, 2021, and was subsequently amended by three trailer bills in June 2021, January 2022, and December 2022.⁵ The SAFE-T Act included different effective dates for different provisions; the last effective date was January 1, 2025, by which time all Illinois law enforcement agencies were to comply with the law's provisions relating to the use of body-worn cameras.⁶

Legislation aimed at law enforcement effectively influences change when: it is implemented with community participation; there is oversight of the implementation process; there is institutional acceptance by law enforcement; ongoing support and legislative guidance is provided; and there is sufficient funding. In February 2024, Illinois State Senator Elgie Sims, Jr., Senator Robert Peters, and Representative Justin Slaughter formed the Workgroup to Implement the SAFE-T Act Policing Provisions to assess the implementation status of the policing provisions in the SAFE-T Act and support its implementation. The Workgroup is managed by

the Illinois Justice Project (ILJP), which contracted with the Center for Effective Public Policy (CEPP) to assist with the work. Membership in the Workgroup is comprised of representatives from state and local law enforcement agencies, community advocates and organizations, and academics.⁷

The goals of the Workgroup are to assess the status of implementation, identify barriers to implementation, highlight successful models to replicate, inform agencies about available resources for funding and guidance, and develop sustainable practices that ensure compliance with the SAFE-T Act. To achieve these goals, Workgroup members regularly convened throughout 2024 to highlight advances and trends in policing reform nationally and to share insights with one another about the challenges and successes of implementing the mandated police reform in Illinois. The Workgroup agreed to focus its efforts on five priority provisions: (1) Reporting, (2) Use of Force, (3) Body-Worn Cameras, (4) Training, and (5) Decertification.⁸ The Workgroup also noted its interest in assessing the adequacy of and access to statewide funding for implementing the identified policing provisions.

This report is the culmination of the Workgroup's efforts to assess the implementation status of the SAFE-T Act's policing provisions. Following the release of this report, the Workgroup will collectively develop recommendations and strategies for advancing implementation and ensuring compliance in alignment with the underlying goals of the SAFE-T Act, including holding police accountable, reducing police misconduct, increasing trust between law enforcement and community members, and as a result of the aforementioned, improving the working relationship between law enforcement and community members to solve crimes and improve public safety. This report, therefore, does not include recommendations. Following a summary of the assessment activities undertaken by the Workgroup, this report discusses each of the five priority provisions: reporting, use of force, body-worn cameras, training, and decertification. For each provision, the report provides national context, the details of the SAFE-T Act requirements, and the status of implementation.

Summary of Assessment Activities

The Workgroup conducted several activities to examine the implementation status of the SAFE-T Act's policing provisions. This included hosting presentations from national policing experts, receiving updates from Workgroup members on implementation progress, developing

and distributing a survey for law enforcement agencies, and conducting a series of listening sessions with law enforcement personnel and, separately, community members.

National Subject Matter Experts at Workgroup Meetings

Several national policing subject matter experts spoke to the Workgroup and offered their perspectives on various topics.

- **Walter Katz**⁹ presented at the Workgroup meeting in March 2024, providing a high-level overview of the national trend of fewer people entering the policing profession and efforts to effectuate police accountability.
- **Emily Gunston**¹⁰ presented to the Workgroup in July 2024, sharing lessons learned from police reform efforts nationally, offering reflections on the SAFE-T Act, and identifying the main ingredients needed for policing reform to succeed.¹¹
- **Dr. Andrea M. Headley**¹² presented to the Workgroup in October 2024, providing an overview of the recent research on body-worn cameras and describing both the limitations and benefits of programs requiring body-worn cameras.

Presentations by Illinois Stakeholders

Workgroup members also heard from representatives of state agencies who had experience with or responsibility for implementing some of the SAFE-T Act's policing provisions. These presentations included:

- **Jeffrey Chapman**, from the Illinois Law Enforcement Training & Standards Board (ILETSB),¹³ presented to the Workgroup in July and October 2024, providing an update on the SAFE-T Act training provisions and a summary of body-worn camera funding.
- **Ellie Borgstrom & Tim Lavery**, from the Illinois Criminal Justice Information Authority (ICJIA),¹⁴ presented to the Workgroup in August 2024, sharing a summary and analysis of the SAFE-T Act reporting provisions.
- **Keith Calloway, Patrick Hahn, and John Keigher**, from ILETSB, presented to the Workgroup in August 2024, providing updates on training, the new decertification process, and body-worn camera funding.
- **Declan Binninger**, from the Illinois State Police (ISP), presented to the Workgroup in October 2024, sharing an update on the State Police's implementation of body-worn cameras.

Law Enforcement Survey

The Workgroup’s Assessment Committee developed a survey to distribute to law enforcement agencies, allowing them to share their progress, successes, and challenges in implementing various SAFE-T Act provisions. The survey was divided into five parts, mostly aligned with the priority provisions, each of which could be completed independently of the others, allowing different agency personnel with relevant expertise to answer each part.

Survey Part	Topic(s)
General	Interpretation, policy, management, communication, and oversight.
Training	Training requirements introduced by the SAFE-T Act, including training topics, training formats, accessibility of training, and compliance with required training.
Reporting	Reporting requirements introduced by the SAFE-T Act, including use of force, mental health dispatches, deaths in custody, and officer professional conduct database reporting.
Body-Worn Cameras	Body-worn camera requirements introduced by the SAFE-T Act, including the purchase and maintenance of BWCs and related software, policies on BWCs, and funding for BWCs.
Use of Force	Use of force requirements introduced by the SAFE-T Act, including policies and procedures, training, and compliance.

Table 1 - Assessment Committee Survey Topic Areas

The survey was distributed to law enforcement agencies by ILETSB, the Illinois Association of Chiefs of Police (ILACP), and the Illinois Sheriff’s Association. Through this approach, the Workgroup aimed to reach as many of the 800+ law enforcement agencies in Illinois as possible.

Law Enforcement Listening Sessions

From June through August 2024, Jeffrey Chapman (ILETSB Public Service Administrator) and Armando Sanders (CEPP consultant and Deputy Chief of the Montgomery Village (IL) Police Department) conducted five in-person listening sessions with law enforcement personnel to gather feedback on the implementation of relevant SAFE-T Act provisions. The listening sessions were conducted at the end of the following regional meetings:

1. Kendall County Association of Chiefs of Police (June 12, 2024)

2. Central Illinois Police Training Center (June 14, 2024)
3. Champaign County Sheriff's Association (June 25, 2024)
4. Northeast Multi Regional Training (NEMRT) (Mobile Training Unit 3)¹⁵ (July 24, 2024)
5. Tri River Regional Training (Mobile Training Unit 16) (August 5, 2024)

Seeking additional feedback from the law enforcement community, the Workgroup hosted three virtual listening sessions on November 4, 6, and 13, 2024. ILETSB, ILACP, and the Sheriff's Association distributed an invitation to attend these listening sessions to all police departments and sheriff's offices under their purview.

Community Listening Sessions

From June through December 2024, the Workgroup held several virtual and in-person community listening sessions to engage residents in discussions about public safety policies and the provisions of the SAFE-T Act. The Workgroup organized the in-person sessions in partnership with Live Free Illinois.¹⁶ The sessions focused on understanding the participants' current knowledge of each provision and the types of information they would want to access from law enforcement regarding each provision. Additionally, the sessions served to educate communities on the key changes made by the SAFE-T Act in the priority areas.

The listening sessions were led by Shelby Royster and Lena Hackett (CEPP contractors with Community Solutions, Inc.), Tanya Anderson (CEPP), and Donovan Williams (ILJP).

They were conducted as follows:

1. Justice 20/20 Community Safety Working Group Meeting (Virtual; June 27, 2024)
2. Community Listening Session (Virtual; October 16, 2024)
3. Waukegan, IL (In-person; November 8, 2024)
4. Kankakee, IL (In-person; November 15, 2024)
5. East St. Louis, IL (In-person; December 6, 2024)

Limitations

Despite the Workgroup's efforts to broadly collect information and data from people across Illinois, this assessment report has limitations:

- The in-person and virtual listening sessions for law enforcement were attended by approximately 400 people but likely reached a smaller number of distinct agencies or departments, because multiple people from a single agency attended.

- Nearly 100 law enforcement agencies responded to the survey, but there are over 800 such agencies in Illinois.¹⁷
- Participation in the community listening sessions was limited. Eighteen people attended the virtual sessions, and just over 75 attended the in-person sessions.
- No in-person listening sessions for law enforcement or community members were held in rural areas of Illinois.

Priority Provision #1: Reporting

The section begins with the national context surrounding law enforcement data reporting requirements, then details the relevant SAFE-T Act provisions, and concludes with an assessment of implementation.

National Context

Law enforcement data reporting has received increased attention from the public and policymakers alike over the past decade, especially after the killings of Michael Brown and Eric Garner ignited nationwide protests.¹⁸ Following these incidents, there was a greater demand to hold police accountable for their misconduct. The need for increased police accountability and transparency was acutely felt in Illinois after the police killings of Rekia Boyd and Laquan McDonald sparked community action across the state. As public demand for police accountability in cases of excessive force grew, it became apparent that understanding the scope of the problem, making informed policy decisions, and evaluating the success of reforms would be difficult without consistent, integrated, high-quality data collection on specific metrics, including use of force by law enforcement officers and deaths in custody.¹⁹

Despite the need for and interest in such data, national efforts at creating centralized databases have faltered over the past decade.²⁰ For example, the Federal Bureau of Investigation's (FBI) National Use of Force Data Collection, an initiative launched in 2019, has faced significant challenges over the past five years.²¹ Participation in the data collection is voluntary, as federal agencies, including the FBI, do not have the authority to mandate data reporting.²² Efforts to increase reporting have included garnering support from law enforcement professional associations, proposing making federal grant funding contingent on reporting compliance, and supporting state-level legislation requiring use of force reporting.²³ Amid these efforts, the FBI reported that as of 2024, it had received use of force data from agencies that

employ 72% of sworn U.S. law enforcement officers.²⁴ Even with this federal database, there is still limited data on how and why an encounter involving police use of force crosses over from reasonable to excessive.²⁵

Another relevant program experiencing challenges is the federal death-in-custody reporting program.²⁶ Established by the Death in Custody Reporting Act (DCRA), a federal law enacted in 2000 and renewed in 2013, DCRA required the Department of Justice (DOJ) to publish a report about deaths in custody by the end of 2016.²⁷ However, the DOJ did not begin collecting data in the format mandated by the DCRA until 2019, and pervasive data quality issues have plagued the system ever since.²⁸ For example, in 2021, the DCRA dataset undercounted more than 990 deaths, and more than 70% of the reports were missing data.²⁹ These reporting issues have garnered widespread criticism from legislators, government agencies, academics, nonprofits, and journalists.³⁰ The DOJ estimated it could fulfill some of its DCRA reporting requirements by September 2024—eight years past its original deadline. However, as of November 2024, no public announcements regarding progress have been made.³¹

Summary of SAFE-T Act Reporting Requirements

The SAFE-T Act contains multiple provisions mandating law enforcement data reporting. This report focuses on required reporting related to 911 law enforcement dispatches responding to mental health incidents, use of force incidents, and deaths in custody.

Mental Health Dispatch Reporting Requirements

Section 50 ILCS 709/5-12 requires that, as of July 1, 2021, law enforcement agencies submit to the Illinois State Police monthly “a report on incidents where a law enforcement officer was dispatched to deal with a person experiencing a mental health crisis or incident. The report shall include the number of incidents, the level of law enforcement response and the outcome of each incident.” A mental health crisis is defined as “when a person's behavior puts them at risk of hurting themselves or others or prevents them from being able to care for themselves.” These reporting requirements support another bill that passed in August of 2021: the Community Emergency Services and Support Act (CESSA).³² CESSA establishes a behavioral health first responder program, using 911 dispatchers to redirect mental health calls to these teams.³³

Use of Force Reporting Requirements

Sections 50 ILCS 709/5-12 also requires that, as of July 1, 2021, law enforcement agencies submit to ISP monthly “a report on use of force, including any action that resulted in the death or serious bodily injury of a person or the discharge of a firearm at or in the direction of a person.” The relevant Illinois Administrative Code clarifies that “the report shall include any action that resulted in the death or serious bodily injury of a person or the discharge of a firearm at or in the direction of a person,” implying that the report need not include the use of force that does not result in death, serious bodily injury, or the discharge of a firearm in the direction of an individual.³⁴ The code further defines “serious bodily injury” as “bodily injury that involves a substantial risk of death, unconsciousness, protracted and obvious disfigurement, or protracted loss or impairment of the function of a bodily member, organ, or mental faculty.”

These definitions align with those used by the FBI's Use of Force Data Collection program. Notably, there is no universally accepted definition of “use of force” used by federal, state, and local law enforcement agencies. Modern law enforcement standards typically view the use of force as a continuum, ranging from verbal commands at one end and lethal force at the other.³⁵ The definition used by the FBI and Illinois is far from inclusive of all instances where force is used by law enforcement officers.³⁶

The Administrative Code also specifies that agencies shall submit “zero reports” if the agency has no use of force incidents to report in a given month.³⁷ Zero reports allow agencies to confirm that they have recorded zero incidents for a particular month. Submitting a zero report is straightforward, typically requiring completion of only a few fields on a shorter form. This form of reporting is especially valuable for data scientists because when agencies fail to submit a report, it can be difficult to ascertain whether they are reporting zero incidents or simply overlooked submitting the report.

Death-in-Custody Reporting Requirements

Section 730 ILCS 210/Art. 3 states that, effective January 1, 2022, “[l]aw enforcement agencies shall... report all cases in which a person dies while in the custody of (A) a law enforcement agency; (B) a local or State correctional facility in this State; or (C) a peace officer; or as a result of the peace officer's use of force.” This definition aligns fairly closely with the federal standards established in the Death in Custody Reporting Act.³⁸ Illinois is one of the relatively few states that publishes individual-level death-in-custody data publicly.³⁹

Agencies must report any deaths in their custody to ICJIA within 30 days of the death and include information on the circumstances surrounding the death and whether and how the deceased received emergency medical treatment.⁴⁰ ICJIA partners with ISP to collect arrest-related death data, which meets death-in-custody reporting requirements in many cases. Agencies may also report data directly to ICJIA through an online form or email submission. ICJIA publishes death-in-custody data quarterly, as well as an annual report, on its publicly available website.⁴¹

Implementation Status

To assess the implementation status of the reporting requirements, staff from ICJIA examined the reporting history from 2022 and 2023 of over 1,000 Illinois law enforcement agencies based on those included in the National Incident-Based Reporting System (NIBRS) database, ISP's reporting records, and ICJIA's death-in-custody reporting records.⁴²

It is important to note that the precise number of agencies required to report data is unclear. Many Illinois law enforcement agencies are part of an "in-covered relationship," or an agreement between law enforcement agencies when one agency, the "parent" (typically relatively large and well-resourced), takes on the responsibility for specified law enforcement activities in a "child" (typically relatively small) agency's service area. As of 2024, 181 law enforcement agencies in Illinois are part of an in-covered relationship, with 56 serving as parent agencies and 125 as child agencies. Additional information is needed to understand the nature of these agreements and how they impact reporting, as there may be variations in the nature and scope of in-covered agreements.⁴³

Reports Submitted Annually

Based on an analysis of reporting completed in 2022 and 2023, agencies tend to be either fully compliant with reporting requirements (i.e., submitting reports for all 12 months of the year) or completely non-compliant (i.e., not submitting any reports all year).⁴⁴ For instance, during the years examined, around 450 agencies were completely compliant with mental health and use of force reporting, and around 325 agencies were completely noncompliant. Assuming child agencies are not beholden to reporting requirements, less than half of law enforcement agencies complied with all 12 months of reporting for mental health dispatches or use of force, although there was a slight improvement from 2022 to 2023. A strikingly large proportion of

agencies submitted no reports during the analyzed time period: between one-third and 40% of agencies submitted no reports for mental health dispatches or use of force. Partial compliance (i.e., submitting a report in some months and not in others) hovers just under 20% for mental health dispatch reporting and just over 20% for use of force reporting.

Reports Submitted Monthly

In any given month from 2022-2023, assuming child agencies are not required to submit reports, ISP received 60% of the reports they expected to see each month. Reporting improved slightly from 2022 to 2023 but tended to decline through the calendar year, with reports peaking early in the year and hitting a low towards the end of the year. This was consistent across both mental health dispatch and use of force reports.

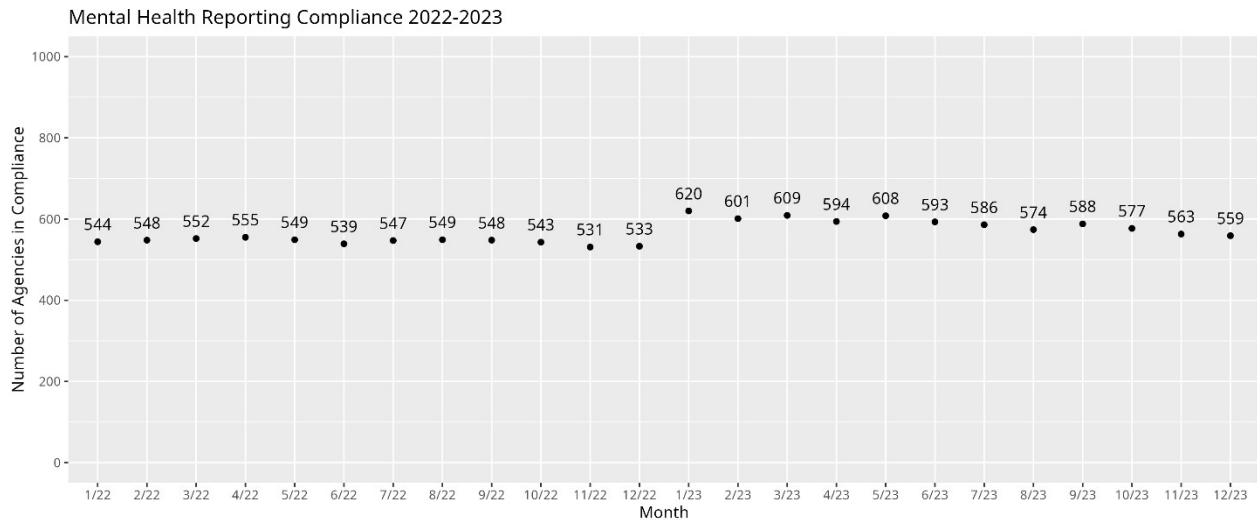


Figure 1 – Law Enforcement Agencies in Compliance with Mental Health Dispatch Reporting Requirements, 2022-2023⁴⁵

The high-water mark for mental health dispatch reporting was January 2023, when ISP received 63% of expected reports (assuming that child agencies are not required to submit reports). The low point was November 2022, when ISP received 54% of expected reports (assuming that child agencies are not required to submit reports).

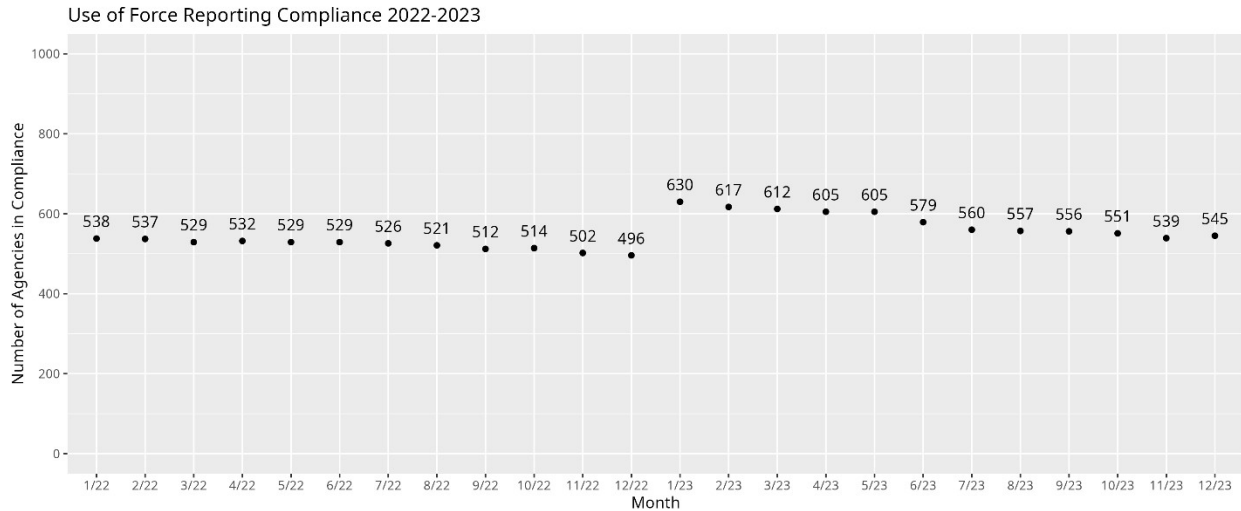


Figure 2 – Law Enforcement Agencies in Compliance with Use of Force Reporting Requirements, 2022-2023

The high-water mark for use of force reporting was also January 2023, when ISP received 64% of expected reports (assuming that child agencies are not required to submit reports). The low point was December 2022, when ISP received 51% of expected reports (assuming that child agencies are not required to submit reports).

Survey and Listening Session Feedback on Reporting Requirements

Law enforcement survey feedback found that, on average, agencies did not find the reporting requirements difficult to comply with; the average difficulty rating for all reporting topics corresponded to “neither easy nor difficult.” The most common barrier to satisfying reporting requirements was interpreting the law (42 of 68 selected this barrier), followed by lack of training on reporting requirements (30 of 68), the need for staff time to comply with the reporting requirements (25 of 68), and issues with technology (24 of 68). When asked how frequently each data type is reported, most agencies gave answers aligned with the relevant legislation (e.g., monthly or as needed). However, for mental health dispatch and use of force data reporting, a sizable minority of agencies indicated that they report data “as needed” rather than reporting on a consistent monthly schedule. This indicates that agencies may not be filing zero reports as required. Over two-thirds of agencies that responded to the survey indicated that they submit reports via manual data entry, which can be a relatively slow method but requires less technical expertise compared to more streamlined methods such as batch or automated uploads.

In line with survey findings, feedback from the listening sessions indicated that law enforcement stakeholders do not feel overly burdened by reporting requirements compared to other SAFE-T Act requirements. However, they indicate some confusion over reporting topics, including the frequency of report submissions, whether zero reporting is required, the definition of reportable incidents, and what types of agencies are covered by reporting mandates. There is also ongoing confusion over the nature of death-in-custody data-sharing agreements between ISP, the Illinois Department of Corrections (IDOC) Jail and Standards Unit (JDSU), and ICJIA, and how these agreements impact reporting expectations for law enforcement agencies.⁴⁶

Community listening sessions revealed that community members often feel disconnected from law enforcement reporting processes. Many participants said they were unaware of what data law enforcement must report, stating, “We don’t even know what information they’re tracking or sharing.” Participants emphasized the importance of consistent and accessible data reporting, particularly concerning the use of force and mental health dispatches. Community listening session participants suggested creating publicly available summaries or dashboards to share aggregated data and trends while maintaining individual privacy protections. Increased transparency in how and when reports are submitted could address confusion among both law enforcement and the community, fostering greater trust and accountability.

Use of Force Reporting—Results

As required by the new law, agencies report use of force data to ISP, which in turn shares it with the FBI’s Use of Force Data Collection program and publishes monthly aggregate statistics on their publicly available Uniform Crime Reporting website.⁴⁷ In any given month, most use of force reports are zero reports (i.e., formal certifications that zero use of force incidents occurred in a given month).

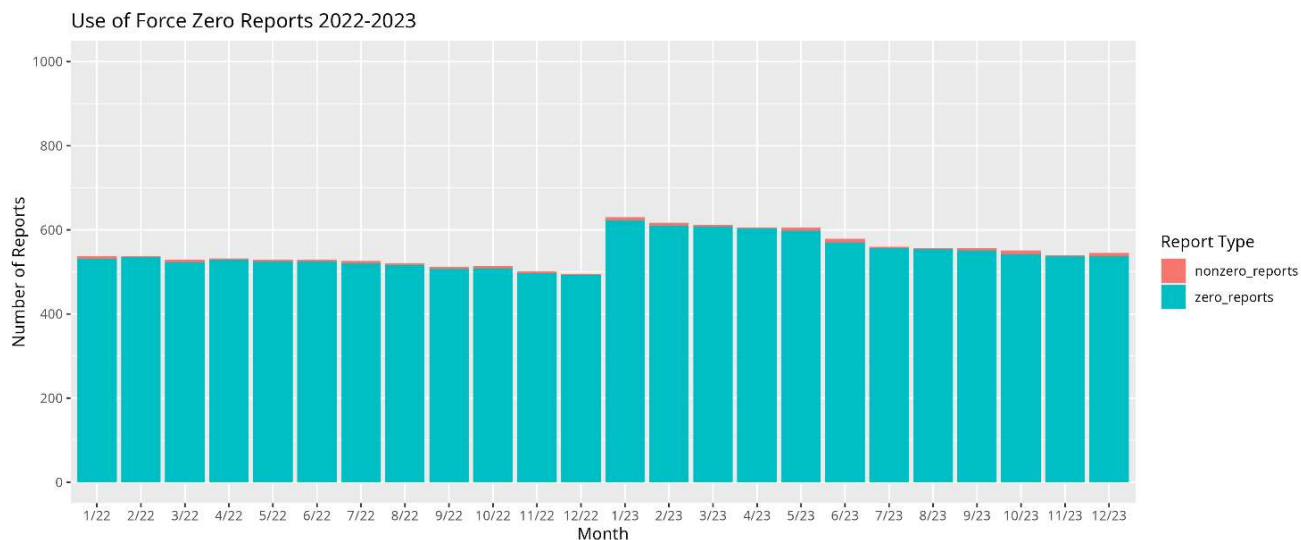


Figure 3 –Use of Force Zero & Non-Zero Reports Submitted per Month, 2022-2023

Based on the narrow definition of reportable use of force incidents (i.e., reportable instances are actions that result in death, serious bodily injury, or discharge of a firearm), it is understandable that the number of reported incidents would be relatively low. The FBI’s National Use of Force Data Collection program, which uses the same definition for reportable use of force incidents, has a similarly high proportion of zero reports in its database.⁴⁸ Some Workgroup members noted that best practices dictate a broader definition of “use of force” for reporting purposes,⁴⁹ and that more information is needed to understand how ISP conducts its data quality audits to ensure all reportable use of force incidents are captured. In addition, one area of particular concern is the inconsistent use of zero reports. Many departments do not submit reports, making it difficult for ICJIA to determine whether the lack of a report indicates non-compliance or that the department in question had no incidents to report.

Mental Health Dispatch Reporting—Results

Data on mental health dispatches are reported to ISP, which publishes monthly aggregate statistics on their publicly available Uniform Crime Reporting website.⁵⁰ During most months, zero reports account for slightly less than half of all mental health dispatch reports.

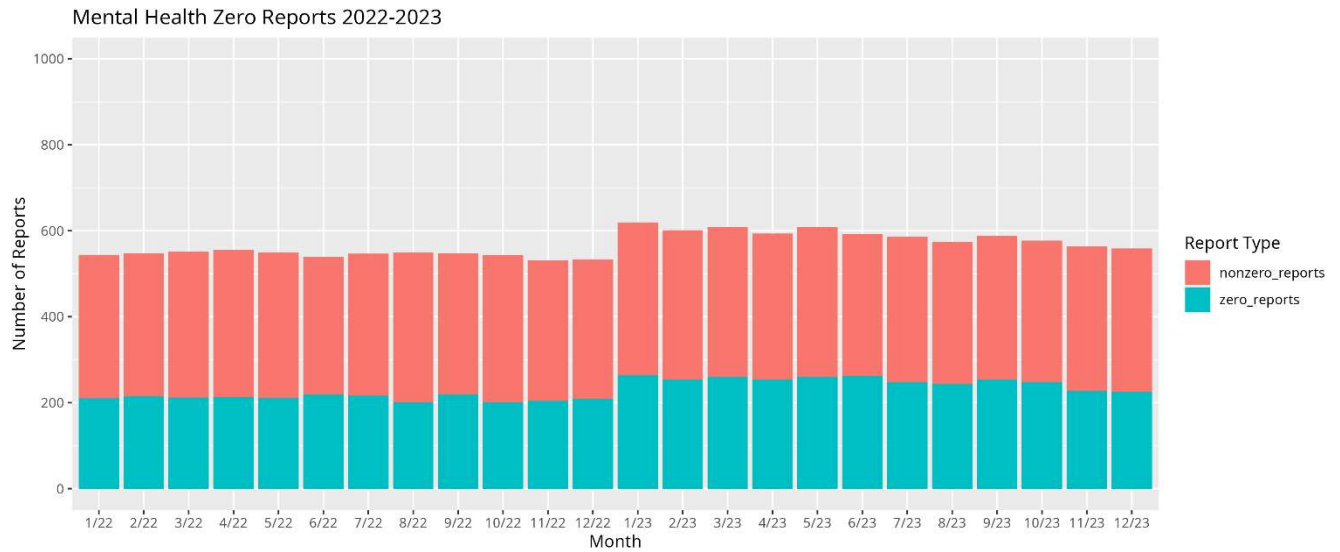


Figure 4 –Mental Health Dispatch Zero & Non-Zero Reports Submitted per Month, 2022-2023

National studies estimate that anywhere from 10-38% of all calls for service involve a mental health component.⁵¹ However, there is little evidence demonstrating dispatchers’ or callers’ accuracy in correctly identifying mental health incidents at the time of a 911 call.⁵² If the goal is to obtain an accurate tally of mental health incidents to which law enforcement responds, focusing solely on *dispatches* may hinder success since dispatchers might not identify all calls for service that include a mental health component. There is limited research on the accuracy of 911 dispatch centers in identifying mental health needs, partly due to variations in practices among different local jurisdictions and inconsistent data collection within call centers.⁵³ Additionally, not all law enforcement interactions with the public are initiated by calls for service. Encounters initiated during patrol, investigation, community outreach, or other activities are not captured in this definition, and any of these may also involve a mental health component. Finally, feedback from Workgroup members and listening session participants revealed that some law enforcement agencies remain unclear on the definition of reportable mental health incidents and may be reporting mental health incidents that officers identify once they are at the scene rather than solely by what is known at dispatch.

Death-in-Custody Reporting–Results

Death-in-custody reports come to ICJIA from multiple sources, including online reports submitted through ICJIA’s website, as well as partnerships with ISP and the IDOC JDSU. These

ISP and IDOC partnerships account for most death-in-custody reporting on behalf of police and sheriffs in Illinois.

Death-in-custody reporting does not utilize zero reporting because data comes from multiple sources, several of which do not utilize zero reports. For this reason, death-in-custody reporting cannot be easily examined on a month-to-month basis. Law enforcement agencies seem unclear about how and where to report death-in-custody data. During the listening sessions, law enforcement personnel had questions about where to find ICJIA’s reporting form for deaths in custody.⁵⁴

Reporting compliance is reviewed by ICJIA during its quarterly death-in-custody audit process, which identifies missing records (i.e., reportable incidents that were not reported as deaths in custody), as well as missing fields in existing reports (e.g., required data fields that are not routinely collected by ISP or IDOC JDSU, fields left incomplete on reporting forms, or fields that should have been updated pending the results of a death investigation).

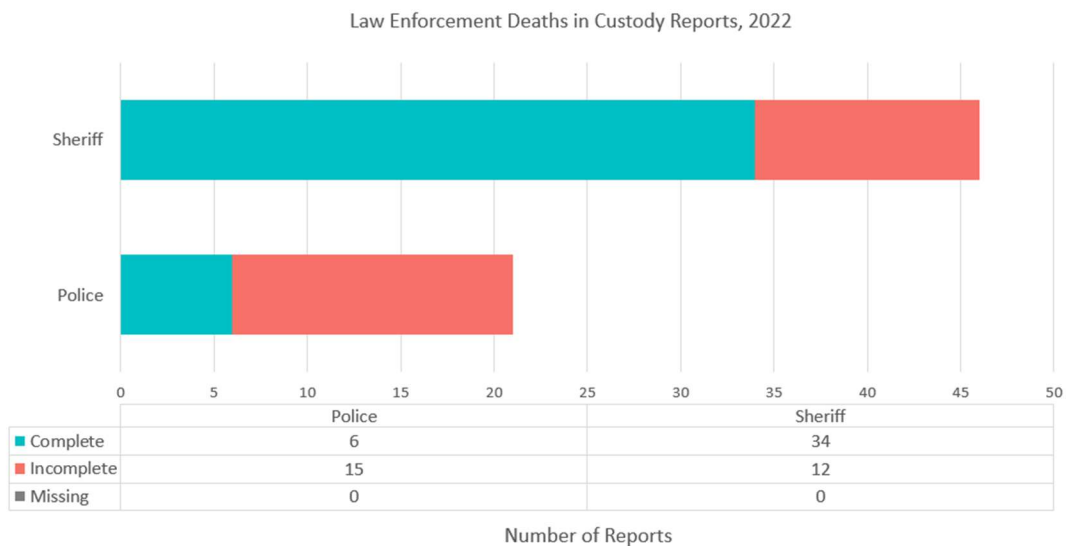


Figure 5 – Law Enforcement Death-in-Custody Reports, 2022⁵⁵

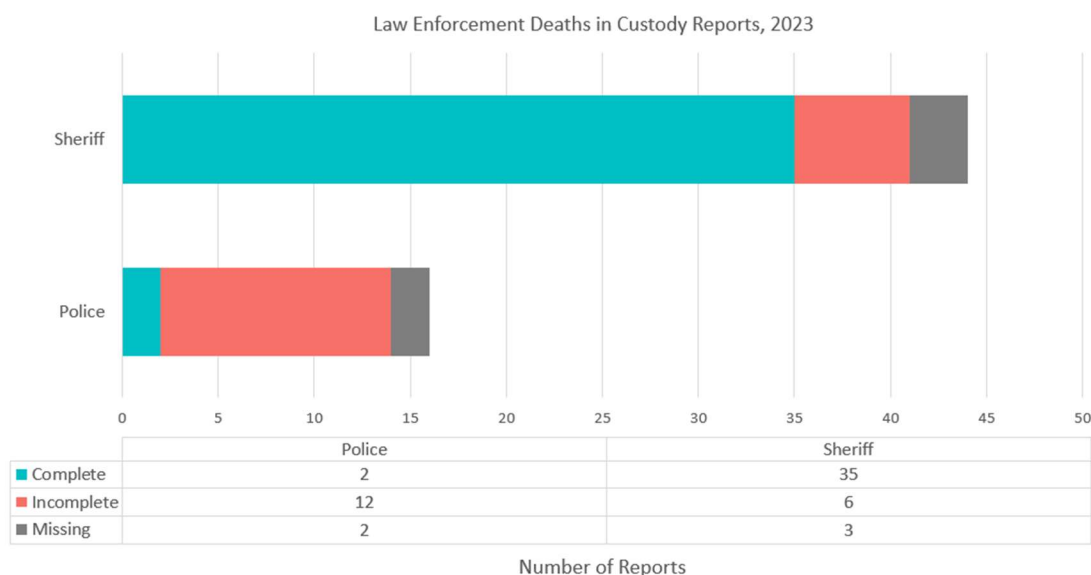


Figure 6 – Law Enforcement Death-in-Custody Reports, 2023

In 2022, 6 of the 21 (about 29%) death-in-custody reports by police departments were complete reports, while the remaining 15 (71%) were incomplete; in 2023, only 2 of the 16 (12.5%) police death-in-custody reports were complete, while 14 (87.5%) were missing one or more fields. For sheriff’s departments in 2022, 74% of the 46 reports were complete, while 26% were missing data; in 2023, 80% of the 44 reports were complete and 20% were missing data. Notably, although a higher proportion of death-in-custody reports from sheriff’s offices were complete, most reports marked the cause of death as “unavailable,” pending investigation (this is likely because medical examinations take many weeks if not months to complete). If it is not known how someone died, it is difficult to determine how future deaths can be prevented and whether the state is fulfilling its obligations.⁵⁶

In 2022, ICJIA did not identify any deaths that were completely missing from police or sheriff records; however, in 2023, 13% of deaths in police custody and 7% of deaths in sheriff’s custody were completely unreported. In 2024, preliminary data indicates that 11 people died in police custody and 19 people died in sheriff’s custody. However, these numbers are still subject to change as ICJIA is in the process of auditing data from the final quarter (October to December) to ensure all cases have been accounted for. As mentioned in the introduction to this section, death-in-custody data quality is a nationwide issue, and data scientists are still grappling

with the best methods to audit data that is self-reported by law enforcement agencies. Common methods include checking data against public records such as open-access databases and media reports.⁵⁷ ICJIA uses both these methods in its own audit processes.

Steps to Improve Reporting Compliance

The ISP Uniform Crime Reporting (UCR) team is taking measures to help improve reporting compliance. The Workgroup learned that the ISP UCR team hired a quality assurance specialist responsible for contacting agencies to follow up on missing data. In addition, due to updates to the NIBRS data reporting system, the ISP UCR team offered additional training and technical assistance during 2023. The NIBRS data reporting system is the method used for collecting crime data from local law enforcement agencies as well as the use of force, mental health dispatch, and some of the death-in-custody data. This may have contributed to the increase in compliance between 2022 and 2023. Additionally, the ISP UCR team found that it was helpful to incentivize compliance—specifically, they reported that tying grant eligibility to reporting compliance motivated several agencies to begin reporting.⁵⁸

ICJIA began piloting a new death-in-custody audit process in 2024, which has helped to identify inconsistencies and improve the quality of the published data. Although there is a monetary fine associated with noncompliance, this enforcement mechanism has not been used by ICJIA to date.⁵⁹

Priority Provision #2: Use of Force

The section begins with the national context around use of force policies, then details the relevant SAFE-T Act provisions, and concludes with an assessment of implementation.

National Context

Use of force and the duty to intervene have been featured nationally in many of the policing reforms passed in the wake of George Floyd and Breonna Taylor’s murders.⁶⁰ Excessive use and misuse of force have dire consequences, particularly for Black and Brown Americans. Compared to their white counterparts, Black Americans are three times more likely to be killed in a police encounter that involves use of force.⁶¹ The unequal and excessive exercise of force by some law enforcement officers has eroded the American public’s trust in police departments and tarnished the reputation of policing as a profession.⁶² A 2020 report by the Independent

Monitoring Team overseeing the court-ordered reform of the Chicago Police Department found that while nearly 80% of white Chicagoans surveyed said police make them feel safer, fewer than half the Black residents who took part felt the same. Just a third of young Black men surveyed felt that police made them safer.⁶³ This same survey also revealed that residents from all backgrounds shared a lack of confidence in the police department, with only about half of all respondents saying Chicago police officers are trustworthy. While the Chicago Police Department is only one of the more than 800 police departments in Illinois, these findings illustrate how high-profile incidents of misconduct and unlawful use of force can erode public trust and feelings of safety.

Partly in response to the perceived ambiguity in policies, many states in recent years have clarified the types of force that officers are permitted to use and under what circumstances.⁶⁴ Some states clarified that deadly force is justified only as a last resort, and some restrict or prohibit the use of deadly force to prevent escape. Others enacted bans on chokeholds and other neck restraints, and some passed laws to restrict officers' use of non-lethal weapons, such as rubber bullets, pepper spray, and tear gas.

The quest for clarification regarding use of force stems in part from the wide latitude individual law enforcement agencies are granted to interpret and train their officers on what constitutes use of force and when use of force is appropriate or excessive.⁶⁵ In the course of their work, law enforcement officers are permitted to use force when necessary to defend themselves or others.⁶⁶ The International Association of Chiefs of Police (IACP) broadly defines use of force as the “amount of effort required by police to compel compliance by an unwilling subject.”⁶⁷ As the National Institute of Justice notes, the IACP definition is a guideline; individual states or agencies may establish as broad or narrow a definition of what “force” requires documentation and reporting as they choose.

The Supreme Court case *Graham v. Connor* (1989) establishes a legal foundation for what constitutes excessive use of force, but it largely allows law enforcement agencies to establish their own policies and practices regarding when officers should use force and how much force is considered reasonable to use. In that case, the Court held that to determine whether a use of force is excessive and beyond the scope of what is permitted, one must consider whether, given “the totality of the facts and circumstances” of an incident, an officer could “believe that force was reasonable.”⁶⁸ As a result of *Graham*, law enforcement agencies write

policies and train their officers to adhere to the standard of what a “reasonable officer” would do when deciding whether a given situation demands force and to what degree.

Some consider the *Graham* decision too vague to serve as the primary guidance for police officers on the distinction between excessive and appropriate use of force. In its 2016 “Guiding Principles on Use of Force” report, the Police Executive Research Forum (PERF) urged law enforcement agencies to institute policies offering “concrete guidance” to “go beyond the minimum requirements of *Graham*” and help prevent officers from finding themselves in dangerous situations where they have no choice but to make a quick decision to use deadly force.⁶⁹ American law enforcement leaders broadly agree that officers should use force only as a last resort and use only the amount of force “reasonable” for the situation.⁷⁰ However, the view of how far the use of force standard in policing should go beyond *Graham* varies across the country, with federal judicial circuits split on whether officer conduct in the moments immediately before the use of force is relevant to determining reasonability. This lack of consensus and the absence of a universal definition for what use of force entails makes determining whether a use of force is reasonable or excessive highly context-dependent and subject to individual judicial interpretation.

Summary of SAFE-T Act Requirements

The SAFE-T Act contains the Statewide Use of Force Standardization Act, which aims to establish uniform statewide standards for the use of force among all Illinois law enforcement agencies.⁷¹ Before these changes, Illinois law allowed officers to use any force they reasonably believed was necessary when making an arrest. The SAFE-T Act changes the use of force standards, provides guidance on making use of force decisions, and specifies prohibited uses of force. It also lays out duties to render aid and intervene.

Changes to Use of Force

Section 720 ILCS 5/7-5 made explicit changes to the standard for the use of force. It now:

- States that an officer “is justified in the use of any force which he reasonably believes, *based on the totality of the circumstances*, to be necessary to effect the arrest and of any force which he reasonably believes, *based on the totality of the circumstances*, to be necessary to defend himself or another from bodily harm while making the arrest.” (emphasis added to indicate changes)

- Compels an officer to “make reasonable efforts” to identify herself and alert individuals that deadly force might be used prior to using force.
- Prohibits the use of deadly force against an individual based on her potential to self-harm so long as a reasonable officer would believe the person poses no immediate threat of death or severe bodily harm to the officer or others.
- Prohibits the use of deadly force against a person suspected of committing a property offense, unless the offense is terrorism, without legal authorization.
- Includes that an officer can use force that may result in death or severe bodily harm when she reasonably believes the person being arrested might cause harm to another person. If the imminent threat of great bodily harm to the officer or others no longer exists, the use of force likely to cause death or great bodily harm is not justified.
- Removes the justification for using deadly force because the person cannot be apprehended at a later date.

Guidance on Making Use of Force Decisions

Section 720 ILCS 5/7-5 clarifies for law enforcement officers the criteria for determining whether it is reasonable to use force in an encounter and the amount of force warranted in specific situations. Officers must consider whether the “totality of circumstances” in a given situation justify using force. In determining whether *deadly* force is reasonably necessary, “officers shall evaluate each situation in light of the totality of circumstances of each case, including, but not limited to, the proximity in time of the use of force to the commission of a forcible felony, and the reasonable feasibility of safely apprehending a subject at a later time, and shall use other available resources and techniques, if reasonably safe and feasible to a reasonable officer.” The Act also provides that use of force decisions should be judged based on what a reasonable officer in the same situation would perceive, considering what is known or perceived by the officer at the time—not with the benefit of hindsight. Law enforcement agencies are encouraged to create policies safeguarding individuals with physical, mental, developmental, or intellectual disabilities, as these individuals are “significantly more likely to experience greater levels of physical force during police interactions.”⁷²

Prohibited Use of Force

Law enforcement officers in Illinois are now explicitly prohibited from using chokeholds or any above-the-shoulder physical restraint that would risk asphyxiation of the held person

without legal justification for the use of lethal force.⁷³ The definition of a chokehold was broadened to mean applying any direct pressure to the throat, windpipe, or airway of another.

Additionally, peace officers, or any person acting on behalf of a peace officer, shall not:

- use force as punishment or retaliation;
- discharge kinetic impact projectiles and all other non-or less-lethal projectiles in a manner that targets the head, pelvis, or back;
- discharge firearms or kinetic impact projectiles indiscriminately into a crowd; or
- use chemical agents or irritants, including pepper spray and tear gas, prior to issuing an order to disperse in a sufficient manner to ensure the order is heard and repeated if necessary, followed by sufficient time and space to allow compliance with the order.

Duties to Render Aid and Intervene

The SAFE-T Act establishes positive legal obligations for law enforcement personnel witnessing or responding to incidents involving the use of force. Under Section 720 ILCS 5/7-15, officers have a “duty to render aid,” meaning they must provide an injured individual with medical assistance as soon as reasonably practical.⁷⁴ Rendering medical aid and assistance includes, but is not limited to, performing emergency life-saving procedures such as cardiopulmonary resuscitation or the administration of an automated external defibrillator; the carrying, or the making of arrangements for the carrying, of the injured person to a physician, surgeon, or hospital for medical or surgical treatment if it is apparent that treatment is necessary, or if such carrying is requested by the injured person.

Officers also have a “duty to intervene” to prevent another officer from using excessive force and to report such intervention to their department.⁷⁵ Section 720 ILCS 5/7-16 requires that a peace officer has an affirmative duty to intervene to prevent or stop another peace officer in his or her presence from using any unauthorized or excessive force, without regard for chain of command. The report of any such intervention must include the date, time, and place of the occurrence; the identity, if known, and a description of the participant(s); and a description of the intervention actions taken and whether they were successful. The report must be submitted within five days of the incident. The Act specifies that an officer who intervenes shall not be disciplined or retaliated against.

Implementation Status

Broadly speaking, Illinois law enforcement agencies report that they are revising their written use of force policies to align more closely with the SAFE-T Act requirements. In the law enforcement survey findings, 55 of 73 responding agencies reported modifying their policies in response to the SAFE-T Act.

Likewise, in a recent review of ten departments' use of force compliance, the Chicago-based law and policy center Impact for Equity (IFE) found that the departments had updated their written use of force policies following the SAFE-T Act.⁷⁶ While IFE's review cannot comprehensively reflect the policies of the over 800 law enforcement agencies in Illinois, it based its findings on a sample representing departments of varying sizes from across the state. IFE found that, of the departmental use of force policies it sampled, very few were comprehensive. For example, only one of the ten agencies had updated their policies in a manner that fully incorporated all aspects of the SAFE-T Act's use of force mandates. IFE concluded, "The new statewide standards specify instances when officers are not permitted to use force, or certain types of force, and yet several law enforcement agencies did not include these in their updated policies."⁷⁷

The Workgroup's survey responses yielded similar findings. When asked which use of force provisions were incorporated into their policies, one-third to one-half of responding agencies indicated they did not incorporate each of the requirements.

Successful implementation should be gauged not only by considering what changes law enforcement agencies have made to their written policies but also how those changes are interpreted. In the Workgroup's survey of law enforcement, when rating how easy or challenging certain use of force implementation tasks were, respondents gave the task of "interpreting changes to use of force policies in SAFE-T Act legislation" the highest overall difficulty rating of all tasks (an average of 3.21 on a scale of 1 to 5, in which a 5 represented "extremely challenging"). Compliance with new written use of force policies is further complicated by the fact that many departments use third-party policy management services such as Lexipol to update their policies. Based on the survey results, departments' understanding of the use of force requirements may vary widely.

Additionally, when asked during the listening sessions how officers were made aware of or trained on the new policies, attendees reported that officers had to "sign off" on the change (as

notified by Lexipol, PowerDMS, or similar policy or risk management systems), and some noted that they went over the new policy at roll call training.

Truly understanding how the SAFE-T Act's use of force provisions are being implemented and affecting law enforcement behavior requires more data about how use of force incidents have or have not changed following the adoption of the Act. This will require improvement in the amount and quality of data reported by Illinois law enforcement.⁷⁸ Due to low reporting compliance, ICJIA representatives informed the Workgroup that it would be difficult to confidently identify patterns in the use of force across Illinois. Without a clearer picture of how use of force incidents have changed since the SAFE-T Act's implementation, it remains difficult to discern whether modifications to use of force policy on paper are being enacted in practice.

During the community listening sessions, there was strong support from attendees for the new use of force mandates. However, they did not think the public was generally aware of or understood all the new policies, especially the ban on chokeholds and requirements for de-escalation. Participants expressed frustration with the ambiguity of the "reasonable officer" language, taken from the *Graham* decision, that departments often use to outline use of force standards, asking, "What does 'reasonable' even mean? It's not clear." Attendees emphasized the importance of transparent definitions for key terms, such as "serious bodily injury," to avoid subjective enforcement and ensure consistency across law enforcement agencies. Many participants supported public reporting of use of force incidents, categorized by outcomes, to enhance accountability and build trust. Such reports, coupled with standardized language in use of force policies, could help address the concerns raised by community listening session participants and ensure a clearer, more uniform approach to use of force standards.

Priority Provision #3: Body-Worn Cameras

The section begins with the national context around the use of body-worn cameras, then details the relevant SAFE-T Act provisions, and concludes with an assessment of implementation.

National Context

Law enforcement agencies have increasingly utilized body-worn cameras over the past decade. The use of BWCs became more common among U.S. law enforcement agencies

following the 2014 killing of Michael Brown by police in Ferguson, Missouri, and expanded again in 2016 after the Department of Justice announced it would provide federal grants for law enforcement agencies to purchase BWCs.⁷⁹ Many early proponents of BWCs believed recording officer interactions with the public would increase police accountability and transparency to the communities they served.⁸⁰ There is some evidence that BWCs may affect officer behavior. A review of 70 studies of BWC use worldwide found that officers using BWCs appear to have fewer complaints lodged against them compared to officers not using BWCs.⁸¹ Law enforcement officers also see benefits to using BWCs in their work, including officer protection, deterring unwarranted public complaints, and capturing video evidence.⁸² As a well-known criminology professor put it, “Police and the public both like BWCs because they think BWCs can protect them from the other.”⁸³

Even with broad popularity among law enforcement and the public, successful implementation of department-wide and statewide BWC use poses significant challenges. BWCs can be extremely costly, particularly for smaller departments. Agencies must pay to acquire cameras, as well as for ongoing maintenance, data storage for collected video footage, and the administration and labor required to fulfill FOIA requests for BWC footage.⁸⁴ Further, any benefits BWCs may provide law enforcement or community members appear to be contingent on successful implementation within the specific contexts of the jurisdictions in which they are used.⁸⁵

Summary of SAFE-T Act Requirements

Illinois initially instituted legal guidelines for the use of BWCs by law enforcement with the Illinois Law Enforcement Officer-Worn Body Camera Act of 2016 (“BWC Act”).⁸⁶ The BWC Act did not mandate the use of BWCs but established statewide standards for BWC technological capabilities and when and where they should be used. Under the BWC Act, Illinois law enforcement officers are required to activate their BWCs whenever they are in uniform and responding to a call or interacting with the public, including during traffic stops, responses to 911 calls, making arrests, searches, or conducting interrogations.⁸⁷ Officers may turn their cameras off when performing “community caretaking functions,” but must reactivate them if they suspect a crime is being or has been committed.⁸⁸ BWCs must be capable of recording up to 10 hours of footage and capturing the 30 seconds preceding an interaction.⁸⁹ After obtaining BWC footage, agencies are required by the BWC Act to retain footage for at least 90 days before

destroying it. Agencies are only required to retain footage past the 90-day threshold if it is “flagged” as containing content relating to an arrest, a civilian complaint against an officer, or a use of force incident.⁹⁰

The SAFE-T Act incorporates the standards of the BWC Act and amends it to require that all Illinois law enforcement agencies implement BWC use for all their officers.⁹¹ Agencies have been required to comply with this amendment on a rolling basis over the last three years, depending on the size of the municipality they serve.⁹² As of January 1, 2025, all local and state law enforcement agencies are expected to comply with the BWC mandate.⁹³ The SAFE-T Act gives ILET SB the responsibility of overseeing and managing grant award funding for BWC implementation.⁹⁴

The SAFE-T Act also places restrictions on when and how BWC footage may be used. Officers may not review their own BWC footage when completing an incident report regarding either involvement in or witnessing an officer-involved shooting or a report in the investigation of a misconduct claim against said officer.⁹⁵ Additionally, recording officers are prohibited from redacting, duplicating, or otherwise altering BWC footage within the 90-day retention window, with some exceptions.⁹⁶ The SAFE-T Act empowers ILET SB to create uniform statewide standards for BWC use that all Illinois law enforcement agencies must adopt.⁹⁷ The BWC Act requires that all departments report to ILET SB on their BWC use annually, including (1) a brief overview of the makeup of the agency, including the number of officers utilizing officer-worn body cameras; (2) the number of officer-worn body cameras utilized by the law enforcement agency; (3) any technical issues with the equipment and how those issues were remedied; and (4) a brief description of the review process used by supervisors within the law enforcement agency.

Implementation Status

Law enforcement agencies seem to be complying with the SAFE-T Act’s mandate to implement BWC use for all their officers. Sixty-three of 74 responding agencies in the Workgroup’s law enforcement survey indicated that they were currently using BWCs as specified in the SAFE-T Act, and seven respondents indicated that they were “working on it.” This finding is consistent with the BWC reports submitted to ILET SB in 2023. As part of this assessment, ILJP reviewed a random sample of 35 of the 180 departmental reports submitted to ILET SB in 2023: 74% of departments that shared data about their BWC usage were already in compliance with the SAFE-T Act’s mandate of one BWC per officer in a given agency.⁹⁸ These

results also reflect the comments of law enforcement stakeholders in listening sessions and Workgroup meetings, which indicated that most departments had used BWCs before they were officially required. In the survey, 58 of 74 respondent agencies indicated their departments used BWCs before the SAFE-T Act mandate took effect.

Community listening session participants reported highly valuing BWCs for improving officer accountability and potentially deterring misconduct. However, there was uncertainty about when officers have the discretion to turn cameras on and off, which impacts the perceived transparency of BWC programs. Participants noted that clear, well-publicized policies must mandate consistent BWC usage during officer interactions with the public. Participants consistently emphasized the importance of ensuring body cameras are always on during interactions and clearly notifying individuals when activated. Feedback also highlighted a strong demand for accessible footage and reports, with participants expressing concerns such as, “We don’t know if the cameras are on or what’s being recorded.” Community listening session participants suggested that, to continue to build trust, law enforcement agencies should standardize activation protocols and develop mechanisms for proactively sharing footage and usage reports with the public.

Funding Challenges

One key challenge for departments seeking to become or remain compliant with the SAFE-T Act’s BWC mandate is securing ongoing funding. Law enforcement stakeholders in Workgroup meetings and listening sessions commented that any accounting of the cost of BWCs must include not only the cameras themselves but also the costs of camera maintenance and repair, digital storage of captured footage, and personnel to manage and review BWC footage.⁹⁹ The law enforcement survey results are consistent with these comments: the top three barriers to meeting the BWC requirements are the cost of cameras, the cost of data storage, and the lack of personnel to review footage and respond to FOIA requests. The Illinois General Assembly has attempted to meet departments’ funding needs for BWCs by increasing available grant funding in the wake of the SAFE-T Act, allocating \$33 million for BWC grants in FY2024 to be administered through ILETSB. These grants can reimburse video storage costs, BWC training, and the cost of the cameras themselves, including leasing fees. The grant cannot be used for redaction software.

The law enforcement survey results suggest that departments are broadly aware of ILET SB’s BWC grants, but many do not apply for and secure funding through the current process. Of the 33 departments that responded to the question about receiving grant funding, only 17 indicated they received funding from ILET SB. On average, survey respondents found securing funding for BWCs to be “moderately challenging,” rating it a 3.87 on a 1-5 scale, where 5 represented an “extremely challenging” task. Applying for ILET SB grants and local government grants were rated a 3.4 in difficulty by responding agencies, while applications for federal grants from the Department of Justice rose to an average difficulty of 3.5.

For several reasons, obtaining funding through the grant process may be difficult for Illinois law enforcement agencies. In a presentation to the Workgroup, ILET SB noted that its BWC grants are retroactive, meaning departments must pay the costs of BWC acquisition or initial data storage upfront and seek reimbursement from ILET SB. ILET SB is currently piloting a process to offer upfront grants to departments for BWC funding to reduce this hardship; that new process for FY2025 was released on November 11, 2024. With the new process, ILET SB will provide an agency with pre-approval of an amount in advance of the purchase. Another challenge is that ILET SB requires annual costs based on the fiscal year, but many agencies have “bundled” multi-year contracts with vendors, and these agencies have had difficulty obtaining accurate per-year pricing from vendors for the items covered under their grant by ILET SB.¹⁰⁰

Departments also struggle to qualify for ILET SB funding because a grant award can only be made if applicants are in full compliance with the UCR Act and have completed state-mandated officer training. This requirement applies to each officer within the applicant department. An ILET SB representative noted that agencies may voluntarily withdraw from the application process upon realizing they are out of compliance with mandated training or reporting and cannot fulfill the Board’s requirements. This complication in the ILET SB grant application process underscores the interconnected nature of successfully implementing the SAFE-T Act’s provisions: For departments to secure sustainable funding for their BWC equipment, storage, and personnel, it is key that they have consistent access to qualified trainers and ensure that all officers in their department are up-to-date in their mandated training.

ILET SB has awarded \$9.9 million of its \$33 million allocation. ILET SB has had to ramp up its grant operations quite significantly, as shown in the numbers in the table below.

Fiscal Year	Allocation	Amount Requested	Amount Awarded	Number of Requests	Number of Awards
2018	\$3 million	\$4 million	\$2.9 million	140	57
2024	\$33 million	\$14.9 million	\$9.9 million	214	171

Table 2 – ILETSB Body-Worn Camera Grant Allocations, 2018 vs. 2024

The table above indicates that ILETSB is making efforts to distribute more money. For instance, they now receive and review applications twice rather than once per fiscal year. More extensive collaboration and communications with law enforcement agencies may assist these efforts.

Another issue with the grants is that a grant award does not cover all related costs. For instance, it does not cover redaction software, which is needed by all agencies. Many agencies had questions for ILETSB during the law enforcement listening sessions, such as “Can an agency apply for funding for both body cameras and in-car cameras in the same cycle?” (Yes) and “Does the ILETSB Grant apply to renewing or upgrading body cameras for agencies?” (It applies to new cameras, per officer. It will not upgrade equipment unless the purchase of a new camera is the upgrade.)

Struggles with FOIA

Law enforcement stakeholders indicated in the listening sessions and the survey that responding to FOIA requests is the most challenging (and unexpected) aspect of using BWCs. Law enforcement believes many of the FOIA requests they are receiving are not First Amendment requests (e.g., from the press or private individuals for non-commercial purposes); rather, they are from individuals seeking to post the footage on their social media channels and monetize the content. Although agencies have used BWCs for many years, the rise of short-form video content on social media has introduced a new challenge that did not exist a few years ago. Police believe that individuals are reviewing the crime blotter and then requesting footage for content that might be of interest.

Fulfilling these requests requires staff to have the capacity to review the incident footage, redact sensitive or otherwise protected content, and produce the footage. A law enforcement

listening session participant shared, “Medium-sized agencies can be crushed by two or three FOIAs for BWC footage that is releasable.” Redacting the video is challenging and often requires specialized redaction software to anonymize the footage. Without this software, an individual must manually redact BWC footage frame by frame, resulting in one request requiring days of work to complete.

Additional data may be needed to better understand the volume of requests, the time it takes to respond, costs, and other factors. The Illinois Association of Chiefs of Police reported that it is creating a working group to discuss this issue and to consider how to distinguish between non-commercial requests and those for social media. The Workgroup has requested that ILACP report when they have completed their work.

Priority Provision #4: Training

The section begins with some national context around law enforcement training requirements, then details the relevant SAFE-T Act provisions, and concludes with an assessment of implementation.

National Context

Nearly all states have laws that address law enforcement training requirements. Generally, these laws require law enforcement personnel statewide to be trained on specific topics. According to the National Center for State Legislatures, 41 states have laws on initial (or basic) training; 41 states and the District of Columbia address training at recurring intervals or some point after initial training, often known as in-service training or continuing education; and 19 states have laws addressing specialized training (e.g. training on use of force and de-escalation).¹⁰¹

State laws commonly (but not always) specify the topics and content to be addressed in training, the required number of training hours, and the method of training (e.g., in-person, online, scenario-based). In recent years, it has become more common for states to require training on the use of force and de-escalation, interactions with specific populations (such as survivors of domestic violence), physical and mental health, crisis intervention, and cultural and racial bias. Expanding and revising police training requirements is a common police reform strategy, particularly in relation to the use of force and bias.

In general, training requirements serve to enhance law enforcement effectiveness and build community trust. Specifically, these requirements are designed to enhance officers' skills and knowledge, improve their decision-making under pressure, strengthen community relations, reduce use of force incidents, increase accountability, support the health and safety of officers, and standardize practices across localities.

Summary of SAFE-T Act Requirements

The SAFE-T Act added new probationary and in-service training requirements for law enforcement officers covering various topics.

New Minimum In-Service Training Requirements.

In addition to existing requirements, the SAFE-T Act (50 ILCS 705/10.6) requires active law enforcement to complete at least 30 hours of training every three years, including:

- At least 12 hours of hands-on, scenario-based role-playing.
- At least 6 hours of instruction on use of force techniques, including de-escalation, to prevent or reduce the need for force whenever safe and feasible.
- Specific training on the law concerning stops, searches, and the use of force under the Fourth Amendment to the United States Constitution.
- Specific training on officer safety techniques, including cover, concealment, and time.
- At least 6 hours of training focused on high-risk traffic stops.

Additionally, before the passage of the SAFE-T Act, police officers were required to complete training on “cultural competency” every three years. That requirement is now replaced by “implicit bias and racial and ethnic sensitivity training” (50 ILCS 705/7).

Finally, new *annual* training is required on emergency medical response, crisis intervention, and officer wellness and mental health.¹⁰²

New Basic Training Requirements.

The SAFE-T Act (50 ILCS 705/7) included new curriculum requirements for schools that train probationary police officers. In addition to pre-existing requirements, the SAFE-T Act added:

- Crisis intervention training
- Minimum hours on various topics, similar to the new requirements for in-service officers, namely: at least 12 hours of hands-on, scenario-based role-playing; at least 6

hours of instruction on use of force techniques, including the use of de-escalation, to prevent or reduce the need for force whenever safe and feasible; specific training on officer safety techniques, including cover, concealment, and time; and at least 6 hours of training focused on high-risk traffic stops.

New Curriculum Development

ILETSB is required under 50 ILCS 705/10.17 to develop a new training curriculum of at least 40 hours on Crisis Intervention Team (CIT) programs. The legislation mandates that the CIT training be a collaboration among law enforcement professionals, mental health providers, families, and consumer advocates and must, at a minimum, include the following components:

- Basic information about mental illnesses and how to recognize them
- Information about mental health laws and resources
- Learning from family members of individuals with mental illness and their experiences
- Verbal de-escalation training and role-plays

Deflection Programs

For agencies receiving state funding for deflection programs (programs that provide pathways to treatment and assistance before an arrest or interaction with police), the SAFE-T Act requires (5 ILCS 820/21) that they are trained in:

- Neuroscience of addiction for law enforcement
- Medication-assisted treatment
- Criminogenic risk-need for health and safety
- Why drug treatment works
- Eliminating stigma for people with substance-use disorders and mental health challenges
- Avoiding racial bias in the deflection program
- Promotion of racial and gender equity in deflection
- Working with community partnerships
- Deflection in rural communities

Implementation Status

Although law enforcement survey results reveal that interpreting the training requirements is “somewhat challenging” (receiving an average score of 3.5 out of 5, where 5 is “extremely challenging”), law enforcement members seem to understand the requirements. As required, ILETSB released minimum in-service training requirements in March 2022, which summarize the changes.¹⁰³ Additionally, in January 2022, ILETSB issued in-service training guidelines.¹⁰⁴

During the listening sessions, law enforcement stakeholders expressed criticism of the new requirements. For instance, there is frustration that every law enforcement officer—even those who never conduct traffic stops, such as corrections officers and administrators—must satisfy the “high-risk traffic stop” requirement. A more appropriate universal training, they suggest, would be one that helps officers safely and properly control an aggressive or uncooperative person. Similarly, a participant at a listening session suggested having tiers in the mandatory training based on the actual function of the law enforcement officer, such as line officers, deputy chiefs, etc. Smaller departments also face unique challenges because if an officer must attend training, it necessarily takes her away from her shift and her availability to take calls for service, resulting in overtime expenditures or limited coverage.

Participants in the community listening sessions agreed that regular, in-depth training on cultural competence, de-escalation tactics, and crisis intervention is crucial for fostering trust between law enforcement and the community. Attendees expressed concerns about what they perceived as a low number of annual training hours, suggesting that more frequent and standardized training could yield better outcomes. Many participants emphasized the need for scenario-based training, particularly for handling mental health crises, noting, “Officers need training on how to deal with mental health crises. Right now, it feels like they escalate things instead of helping.” Participants also highlighted the importance of transparency regarding what officers are learning, “We want to know what they’re being trained on. Are they learning how to treat people with respect?” Some attendees suggested that making training materials publicly accessible would promote transparency and demonstrate law enforcement’s commitment to community-focused standards. Expanding hands-on, practical training programs and publishing summaries of training curricula could foster public trust and reassure the community that officers are equipped to address real-world challenges.

New Curricula and Lesson Plans

ILETSSB reported to the Workgroup that it has developed or revised curricula as required by the SAFE-T Act. According to ILETSSB:

- The Board consulted with curriculum development experts from the University of Illinois-Springfield and content experts across the state to quickly craft and insert the applicable revisions into the basic training curricula.
- For the new in-service requirements (emergency medical response training and certification, crisis intervention training, and officer wellness and mental health), these courses were quickly developed from existing frameworks and made available before the effective date.

During the law enforcement listening sessions, individuals described the course certification process as a bit cumbersome: The state must approve the syllabus and the instructor, and then the agency's local Mobile Training Unit (MTU) must approve each course.

Additionally, many participants expressed the desire for greater collaboration among ILETSSB, MTUs,¹⁰⁵ and departments to share lesson plans so that each agency does not have to develop its own. Responding to these comments, some suggested contacting their local MTU for such lesson plans. A representative from North-East Multi-Regional Training (NEMRT; MTU 3) stated that they have a library of certified curricula that they are happy to share with others. Additionally, a representative of ILETSSB explained that its training program "is currently building out what we refer to as Universal Trainings that are essentially a library of courses to address the high demand areas such as High-Risk Traffic Stop & De-escalation Techniques, including Officer Safety & Stops Searches and the Use of Force."

Availability of Training

Many of the challenges facing law enforcement revolve around the availability of training. Based on the law enforcement survey results, the top four training challenges are (1) the availability of hands-on scenario-based role-playing training (an average score of 4 out of 5), (2) complying with the number of hours required for training (an average score of 3.88 out of 5), (3) the availability of training on required topics (an average score of 3.84 out of 5), and (4) getting staff certified to provide mandated training (an average score of 3.75 out of 5). Additionally, based on the survey, the most challenging training topics to comply with are high-risk traffic stops, use of force techniques and de-escalation, and officer safety.

The network of MTUs is essential for helping law enforcement officers fulfill their statewide training requirements. These organizations offer classes, serve as central repositories for curricula, and appear available to help officers navigate the training requirements.

Several questions and comments about the availability of classes were addressed during the law enforcement listening sessions. Medium and smaller agencies seem to face the most difficulty in fulfilling the requirements. In response to several comments that MTU classes fill up very quickly, a representative from NEMRT helpfully explained that, in most instances, they can move people into the class from the waiting list. In addition, if an officer lets them know of her need for the training, they will squeeze her into an overbooked class.¹⁰⁶ A law enforcement listening session participant also suggested that a state training team visit counties around the state to provide requisite training on topics that are difficult to access. Moreover, a survey response suggested that the state hire full-time instructors to teach hands-on scenario-based courses and make them widely available through the MTUs. ILET SB representatives noted to the Workgroup that they encourage agencies to host geographical training sessions to reach multiple departments.

Participants in the listening sessions also questioned whether virtual reality (VR) could be used for scenario-based hours. In response, departments and MTUs shared that some agencies have certified training via VR. This, along with other clarifications provided during the listening sessions, demonstrates that better information could be shared between agencies.

To help officers complete their required training topics, ILET SB issued [guidelines](#) that outline which requirements are met by each training course. For instance, [Crisis Intervention Training](#) (CIT) satisfies the CIT requirement and fulfills the requirements for use of force, de-escalation, civil rights, procedural justice, and human rights. During the listening sessions, ILET SB clarified that de-escalation is part of the high-risk traffic stop training. Even the [Basic SWAT School](#) is certified by ILET SB to cover many of the training mandates, including procedural justice; de-escalation techniques (including some scenario-based hours); laws concerning stops, searches, and the use of force; and officer safety techniques (including some scenario-based hours).

Certified Instructors

ILET SB encourages departments to have in-house certified instructors. However, most departments rely on external trainers to meet their training requirements, with nine departments

relying entirely on external trainers, 40 departments mostly relying on external trainers, and 28 departments relying on both internal and external trainers. At the law enforcement listening sessions, participants had several questions and expressed concerns about getting staff certified. For instance, people asked about the level of operational experience and institutional knowledge required to become certified, and some participants believed that experience is frequently not taken into account. There were also questions about why a certified CPR instructor did not meet the requirements for the emergency medical refresher mandate. People also raised frustrations about the process requiring ILETSB to certify a trainer first and then repeat the process with the local MTU, which they described as “bureaucracy at its finest.”

Many comments made during the virtual law enforcement listening sessions expressed frustration that certified instructors do not receive training credit for the courses they teach. There seemed to be some confusion about this process. Some indicated that the instructor must simply sign the training roster or registration sheet to receive credit, while others understood that the MTU would grant credit to the instructor for only one taught course per year. These comments reflect the need for ILETSB and the MTUs to provide clear and consistent guidance to the field.

Monitoring Training Compliance

Officers are required to verify their compliance with the training mandates of the Illinois Police Training Act (as amended by the SAFE-T Act) every three years.¹⁰⁷ ILETSB states that the compliance verification process is not yet complete, but officers can still access the officer training portal. According to ILETSB, the portal provides officers with the opportunity to fully understand their compliance status and gain a clear understanding of their training history and employment status. Unfortunately, comments from the survey and during the listening sessions expressed dissatisfaction with the officer portal and the overall technology used by ILETSB, with some calling it a “train wreck” and an “archaic computer system.” Many view the training portal as outdated and limited in its functions. For instance, officers do not receive automatic emails about upcoming compliance deadlines, and chiefs do not receive notifications when their officers are out of compliance. Given that training compliance is required to qualify for grant funding from ILETSB, these functions would enhance departments’ abilities to access statewide funding, while also allowing them to better monitor and manage their officers’ training needs.

Priority Provision #5: Decertification

The section begins with the national context around police decertification, then details the relevant SAFE-T Act provisions, and concludes with an assessment of implementation.

National Context

Police decertification is the process of revoking a police officer's certification to serve as a law enforcement officer when the officer commits certain acts or crimes or engages in certain behaviors, like misconduct. All states have such a process, but they differ in the conduct that may give rise to decertification proceedings, the specific procedure for decertification, and their degree of public transparency. A robust law enforcement decertification system ensures integrity in law enforcement, deters misconduct, and enhances accountability, public trust, and community safety.¹⁰⁸ A state-mandated system prevents those involved in serious misconduct from transferring to other jurisdictions.¹⁰⁹ According to the National Conference of State Legislatures (NCSL), between 2020 to 2023, over 360 bills related to police officer certification or decertification were introduced in or passed by state legislatures.¹¹⁰ In 2021 alone, at least 14 states enacted laws that established or strengthened law enforcement decertification processes, and 13 states added laws requiring law enforcement agencies to report misconduct data to the state.¹¹¹ Since 2020, legislation regarding police officer certification and decertification legislation has trended toward four key areas:

1. Standardizing or establishing certification and decertification procedures.
2. Expanding statutory guidance on when decertification can or must be pursued.
3. Requiring certification renewal procedures, including ongoing training.
4. When needed, changing statutory frameworks entirely to allow greater transparency of these processes.¹¹²

For example, in 2020, Massachusetts created a statewide system for certification and decertification, and the state training commission automatically revokes an officer's certification if she is convicted of a felony, is found to have obtained her certification through misrepresentation or fraud, or had a previous certification revoked by another jurisdiction, among other reasons.¹¹³ In 2022, New Jersey passed a law authorizing its Police Training Commission to revoke an officer's license if she does not meet any standard or requirement prescribed by the Commission, and requiring revocation if the officer is convicted of an act of domestic violence, an offense that would preclude her from carrying a firearm, or a crime in any

other state.¹¹⁴ The laws in both Massachusetts and New Jersey require their certifying agencies to submit all revocation decisions to the National Decertification Index.

Summary of Safe-T Act Requirements

The new decertification process under the SAFE-T Act took effect on July 1, 2022, and aims to strengthen oversight, improve accountability, and prevent agencies from unknowingly hiring officers with histories of misconduct. Specifically, the SAFE-T Act amends the Illinois Police Training Act (50 ILCS 705/) and:

- Broadens the behavior that qualifies for automatic decertification.
- Creates a process for discretionary decertification.
- Creates the Illinois Law Enforcement Certification Review Panel.
- Requires that police agencies report complaints, investigations, and disciplinary action involving police officers to ILETSB.
- Creates a public database that lists police officers who have been decertified for misconduct.
- Defines the process that ILETSB must follow for decertification, emphasizing procedural fairness and due process, including the right to a hearing before decertification and the right to appeal.
- Requires law enforcement officers who are certified or have certification waivers to disclose decertification to ILETSB following automatic decertification.

Decertification in Illinois is permanent and applies to all law enforcement officers, except for those affiliated with the Illinois State Police, which follows a separate process.

Automatic Decertification

Before the SAFE-T Act, the only route to decertification was an automatic process triggered by an officer being convicted of a felony offense or misdemeanors related to theft, dishonesty, or unprofessional conduct. Now, any convictions of or guilty pleas to a felony or 41 specific misdemeanors (including domestic battery, solicitation, obstruction, harassment, and tampering with the certification of a public official) will result in the automatic decertification of an officer.¹¹⁵ Since the passage of the SAFE-T Act, there have been 65 total automatic officer decertifications. The Act also empowers ILETSB to issue an emergency order of suspension if an officer is arrested or indicted on a felony charge. The law also defined and made law enforcement officer misconduct a Class 3 felony.

Discretionary Decertification

Discretionary decertification applies when an officer's conduct, although not criminal, is criminally charged or criminally convicted, suggesting she is unfit to serve. The SAFE-T Act broadened the types of behavior that can lead to decertification to include acts of misconduct that may not result in criminal charges (e.g., excessive use of force, failure to intervene, tampering with or concealing evidence or camera footage, committing perjury or knowingly giving false statements, and engaging in unprofessional conduct).

According to ILETSB, the discretionary decertification process includes the following steps:

- After receiving a notice of violation, the Board conducts a preliminary review of the allegations. This may be conducted by the Board's investigators, by an independent agency, or by referral to the employing agency.
- If the preliminary review demonstrates sufficient evidence, the Board proceeds with a full investigation and produces a summary report addressing the elements of the underlying alleged conduct. All witnesses and evidence must be identified in this situation. If the preliminary review does not demonstrate sufficient evidence, the investigation is closed.
- If the summary report establishes a reasonable basis of misconduct related to the actionable items, the notice of violation becomes a formal complaint for discretionary decertification, and it is filed with the Certification Review Panel. If a reasonable basis is not established, the investigation is closed.
- The matter is then assigned to an Administrative Law Judge (ALJ) for an evidentiary hearing. The ALJ presents findings of fact and law for review by the Panel. The Panel then makes a recommendation for decertification or reinstatement to the Board.

The Act also outlines due process for the officers, which includes the right to defend themselves, present evidence to the review panel, and appeal decisions made by the panel.

Transparency Into Outcomes

The SAFE-T Act also introduced reporting mechanisms to promote transparency, giving both the public and government agencies better insight into officer misconduct and decertification proceedings. The Professional Conduct Database is accessible to Illinois law enforcement agencies, Illinois State's Attorneys, and the Illinois Attorney General. Law

enforcement agencies are required to report an officer's conduct when (a) there is a willful violation of policy, official misconduct, or a violation of law, and (b) it results in either a suspension of at least 10 days, it triggers an official investigation, there is an allegation of misconduct or untruthfulness, or the officer resigns during the course of the investigation. Employers are now required to search this database when hiring lateral transfers. If an officer is detected in this database and the agency still wants to proceed with the hire, ILETSB requires the hiring agency to acknowledge and explain why the misconduct does not preclude hiring the person.

The Act also mandates the creation of a public database. The Public Officer Database is available to the public to verify an officer's certification status. ILETSB is also required to produce a publicly searchable database of its completed investigations related to misconduct. Within this database, officers' identities must remain confidential, but the conduct and other data must be searchable.

Implementation Status

The implementation of the new decertification process has faced some delays and obstacles. Initially, automatic decertification was paused in 2023 due to an outstanding federal lawsuit about the definition of certain terms and the due process given to officers. According to ILETSB, which is responsible for implementing this part of the Act, automatic decertification resumed in 2024 following the federal court's decision.¹¹⁶

Discretionary Decertification Status

The discretionary decertification process remains a work in progress, and no hearings have yet been scheduled. However, ILETSB reported the following to the Workgroup:¹¹⁷

- ILETSB created and released a new Form Q, which is used to file a “notice of violation.”¹¹⁸ This can be submitted to ILETSB by a police agency, governmental entity, State's Attorney, or member of the public. As of March 2025, ILETSB had received 504 notices of alleged violations dating back to 2022. 281 of these notices have been investigated and their cases have been closed, predominantly due to insufficient evidence. 223 cases remain open in various stages of the preliminary review and formal investigation processes. Some of these cases are ready to proceed to the stage of being filed as formal complaints once Administrative Rules for the discretionary decertification hearings are approved.

- Twelve of the 13 appointments to the Certification Review Panel have been made and the body has received some initial training.
- On October 11, 2024, the proposed Administrative Rules related to Discretionary Decertification were developed by ILET SB and published in the Illinois Register. The public was invited to review the rules and provide comments either in writing or at public meetings held in October 2024.¹¹⁹ As of March 2025, Administrative Rules have been proposed and presented to the Joint Committee on Administrative Rules and are on second notice, but have not yet been approved for filing with the Secretary of State. No discretionary decertification hearings can begin until the proposed Administrative Rules have been approved.
- The Board created new Certification Counsel positions to serve as prosecutors in these administrative hearings. The Chief Certification Counsel position was filled as of November 2024, and the Board plans to have completed the interviews and selection processes for Assistant Certification Counsel for both Cook and Sangamon Counties by the end of April 2025.
- As of March 2025, the Board is working through the Illinois state procurement process to retain at least three Administrative Law Judges to conduct the hearings.

Transparency Efforts - Status

ILET SB developed the Professional Conduct Database and met the July 1, 2022, effective date. ILET SB reports that submissions to the database and requests to review appear to be increasing.

ILET SB also made the Public Officer Database available through its website at <https://www.ptb.illinois.gov/resources/officer-lookup/>. The database is searchable by first and last name, and each entry shows the officer's name, current or last employer, date of initial certification, certification status, and, if decertified, whether there was a sustained misconduct complaint and the date of misconduct. Although the public-facing "Officer Lookup" feature is live, its functionality is limited and requires users to search for specific officers by name. Other jurisdictions that maintain such public databases have embedded transparency into their decertification process by allowing the public to search similar databases with varying search terms and download a list of all decertified officers. As developed by ILET SB, this database does not provide insights into broader trends or assess the total number of decertifications.

With respect to the public investigations log, ILETSB reports that this database will be operational as soon as decertification hearings commence.

Participants in the community listening sessions reported that transparency in officer certification and misconduct tracking is essential to maintaining public trust. Attendees supported having accessible methods for reporting and sharing updates, such as a public website or regular newsletter, which could provide clear and regular insights into misconduct cases and decertification processes. Many participants felt that the current tools, such as the Officer Lookup tool, were insufficient for fostering trust, noting, “The current officer lookup tool is too limited—it doesn’t show enough information.” Others expressed concerns about whether misconduct and decertification cases are consistently tracked and communicated to the public. Attendees suggested creating a user-friendly, publicly accessible dashboard that tracks decertification and disciplinary actions, updated regularly, to ensure accountability. One suggestion was integrating these updates into police precinct meetings, allowing community members to stay informed and engaged in an ongoing dialogue about officer accountability and public safety initiatives. Ensuring that this data is presented clearly and in a way that encourages community engagement could strengthen transparency and trust.

Funding

This section provides national context on police reform funding, expands on previous discussions of law enforcement funding at federal, state, and local levels, and concludes with an assessment of how these funding streams impact implementation.

National Context

Nearly 300 police reform bills were passed across the country following the murder of George Floyd in 2020.¹²⁰ However, the effectiveness of these measures often depends on adequate funding. For instance, many of the reforms—such as improved police oversight, training, use of force policies, and alternative crisis intervention programs—require substantial financial resources to be fully implemented. Generally, without dedicated funding, police reforms are delayed, inconsistently applied, or fail to materialize altogether.

For example, in 2021, Nevada passed a law placing limits on police use of force practices and mandating that law enforcement agencies report monthly use of force data.¹²¹ Implementation stalled due to funding gaps, and the state did not report to the FBI’s

National Use of Force Data Collection, despite being legally required to do so under the 2021 law. It was only after funding became available through pandemic relief funds in 2023 that Nevada was able to launch a statewide data dashboard, finally bringing it into compliance with the mandate two years later. This example highlights how even well-intended reforms can fall short of their goals without clear financial commitments for implementation.

Available Funding

Police departments are largely supported through federal, state, and local government revenues from taxes, fees, and grants, which fund a range of expenditures related to the operational and programmatic needs of law enforcement agencies.¹²² In 2021, local government revenue accounted for about 87% of total police spending, while federal grants contributed only a small share of expenditures.¹²³ According to the most recent data from 2019, local governments in the U.S. spent \$106 billion on policing, including \$5.1 billion in Illinois alone. Congress, by comparison, appropriated \$2 billion per year nationally, accounting for less than 2% of total police spending¹²⁴.

Although a small share, a portion of federal funding supports law enforcement and public safety initiatives at the state and local levels, often earmarked for specific police reforms, such as hiring community policing officers through the Community Oriented Policing Services (COPS) program or supporting the adoption of body-worn cameras. According to the National Funding Database, Illinois state agencies received nearly \$750 million in federal grant funding between fiscal years 2015 and 2025, a portion of which is passed on to cities and counties through sub-grants by state granting agencies.¹²⁵

At the state level, the Illinois General Assembly appropriated additional funding (specific amounts are not yet available from the Office of Management and Budget) to implement various reforms outlined in the SAFE-T Act. Additionally, state agencies such as ILETSB, the Illinois Department of Human Services (IDHS), and ICJIA provide grant funding for various law enforcement initiatives, such as acquiring police equipment, supporting recruitment and retention, training, and implementing substance abuse and crime prevention strategies.

Overall, grants from federal and state sources to support local law enforcement initiatives may constitute only a small share of overall police expenditures, but they can provide critical support for specific initiatives designed to enhance police officer training, responses to specific types of incidents, the adoption of technology, and officer safety.

Impact on Implementation

While a breadth of resources are available to support police reforms, law enforcement agencies face challenges in identifying and accessing these funding opportunities. Law enforcement stakeholders in listening sessions and Workgroup meetings identified a lack of awareness about existing resources, application processes, and funding timelines as significant barriers.

Additionally, it is important to note that the allocation of funds can vary across jurisdictions due to differences in local needs, state policies, and federal guidelines. For instance, some funding sources are more flexible in how they can be used, while others have stricter requirements with less flexibility, ensuring that funds support specific reforms or practices. Furthermore, applying for state or federal grants requires having staff within local police departments or local government bodies that have the time and expertise needed to write grant proposals, submit grant budgets, and understand grant requirements. Often it is only larger agencies or government bodies that have the staff to apply for these grants, resulting in smaller agencies being unable to access these resources.

With respect to addressing these challenges in navigating the grant process, one guest speaker who presented to the Workgroup emphasized the importance of stronger collaboration among law enforcement agencies, state and local governments, think tanks, research centers, and independent consulting firms to leverage expertise when applying for grants. Illinois agencies, such as ILETSB and ICJIA, also play informal roles beyond their primary responsibilities by offering technical assistance to law enforcement agencies applying for grants. For example, ICJIA representatives presented to the workgroup about their technical assistance capabilities but noted challenges in aligning with the state's fiscal year. Similarly, during a law enforcement listening session, an ILETSB representative directed law enforcement stakeholders concerned about funding opportunities to state-level funding resources.

Conclusion

The SAFE-T Act is heralded as one of the most significant criminal justice reform efforts in the state's history. While many states enacted policing reforms around the same time, few—if any—passed such comprehensive reforms. The need and desire by the public and legislators to

hold police accountable, reduce police misconduct, and increase trust between law enforcement and community members is apparent based on the many mandates of the SAFE-T Act.

Legislation, however, does not implement itself. Since 2021, law enforcement departments, state agencies, and scores of others have diligently worked to meet the requirements imposed by the SAFE-T Act. Although progress has been made, further work is needed. Additional effort is needed to increase reporting compliance, ensure that all officers are adequately versed and trained on the new use of force policies, help law enforcement agencies access the necessary funding to use and maintain body-worn cameras, offer consistent and high-quality training courses, and operate a transparent decertification process. In 2025, the next phase of this work will continue. Most immediately, the Workgroup convened in January 2025 to discuss these findings and will use the rest of the year to develop a series of recommendations that support and facilitate successful implementation.

Change will not happen overnight. But we keep the words of Dr. Martin Luther King, Jr. close at hand as we continue on this journey: “If you can't fly, then run. If you can't run, then walk. If you can't walk, then crawl, but whatever you do, you have to keep moving.”

Appendix

Workgroup Co-Chairs and Member Organizations

- **Co-Chair Robert Peters** (Illinois State Senate)
- **Co-Chair Elgie R. Sims, Jr.** (Illinois State Senate)
- **Co-Chair Justin Slaughter** (Illinois House of Representatives)
- **Attorney General Kwame Raoul** (Office of the Illinois Attorney General)
- **Access Living**
- **American Civil Liberties Union Illinois**
- **Center for Effective Public Policy**
- **Office of the Champaign County State’s Attorney**
- **Chicago Appleseed**
- **Chicago Council of Lawyers Civil Liberties Committee**
- **Office of the DuPage County State’s Attorney**
- **Families Against Mandatory Minimums**
- **Office of Governor J.B. Pritzker**
- **Hazel Crest Police Department**
- **Illinois Association of Chiefs of Police**
- **Illinois Coalition to End Permanent Punishments**
- **Illinois Criminal Justice Information Authority**
- **Illinois House of Representatives**
- **Illinois Justice Project**
- **Illinois Law Enforcement Training and Standards Board**
- **Illinois Municipal League**
- **Illinois Sheriffs’ Association**
- **Illinois State Police**
- **Impact for Equity**
- **Office of the Kane County State’s Attorney**
- **Lawndale Christian Legal Center**

- **Lemont Police Department**
- **Office of Lieutenant Governor Juliana Stratton**
- **Live Free Illinois**
- **Loyola University Chicago Center for Criminal Justice**
- **Montgomery Police Department**
- **NAMI Chicago**
- **Nekritz Amdor**
- **Oswego Police Department**
- **Office of the President of the Illinois State Senate**
- **Office of the Speaker of the Illinois House of Representatives**
- **TASC**
- **University of Chicago Law School**

Endnotes

¹ The Governor’s proposed budget for FY2026 allocates \$48 million in available funds for ILET SB’s Law Enforcement Camera Grant Fund and \$1 million to the ISP for expenses connected to body-worn and in-car cameras. See “Illinois State Budget Fiscal Year 2026,” *State of Illinois Office of Management and Budget*, Feb. 19, 2025, <https://budget.illinois.gov/content/dam/soi/en/web/budget/documents/budget-book/fy2026-budget/Fiscal-Year-2026-Operating-Budget.pdf>.

² “House Bill 3653 – Criminal Justice Reform,” The Truth About the SAFE-T Act, <https://www.hb3653.org/>.

³ Shannon Heffernan, “Beyond the heated rhetoric about bail, what else is in the SAFE-T Act?,” *WBEZ*, Oct. 26, 2022, ; Tiffany Walden, “The conservative backlash to the SAFE-T Act is nothing new,” *Injustice Watch*, Sept. 15, 2022, <https://www.injusticewatch.org/criminal-courts/bail-and-pretrial/2022/misinformation-safe-t-act-backlash/>.

⁴ The sections related to pretrial are known as the Pretrial Fairness Act; most significantly, the new law eliminated cash bond and created a new process for pretrial release and detention.

⁵ “Summary of Amendments to Public Act 101-0652, the SAFE-T Act,” *The Civic Federation*, Dec. 16, 2022, <https://www.civicfed.org/civic-federation/blog/summary-amendments-public-act-101-0652-safe-t-act>.

⁶ Illinois Municipal League, “Officer Body-Worn Cameras Effective July 1, 2021,” *Illinois Municipal League*, Jul. 29, 2024, <https://www.iml.org/file.cfm?key=21580>.

⁷ See the Appendix for a list of the Workgroup members.

⁸ The latter provision was not initially identified as a priority, but Sonia Massey’s murder brought attention and urgency to understand the new decertification process. The Workgroup added it as a priority provision after learning about its implementation from ILET SB in August 2024.

⁹ Mr. Katz is the Director of Policy for the Innocence Project. Previously, he served as Vice President of Criminal Justice at Arnold Ventures, where he focused on police accountability and oversight. His background in law enforcement oversight includes serving as Deputy Chief of Staff for Public Safety in the Mayor’s Office in Chicago, where he worked closely with the Chicago Police Department in developing a new use of force policy and chaired the civilian Crisis Intervention Advisory Committee. Mr. Katz also previously served as the Independent Police Auditor for San Jose, CA; and he served as Deputy Inspector General for the County of Los Angeles Office of Inspector General, overseeing the Los Angeles County Sheriff’s Department.

¹⁰ Ms. Gunston is the Principal and Founder of EAG, where she provides consulting on criminal justice reform and police practices and oversight. Ms. Gunston’s previous roles include positions in the Office of the Attorney General for the District of Columbia, and as the Deputy Legal Director of the Washington Lawyers’ Committee for Civil Rights and Urban Affairs. For nearly 10 years, Ms. Gunston served in the Special Litigation Section of the Civil Rights Division of the United States Department of Justice. She specializes in litigating civil rights cases related to institutional reform, patterns or practices of law enforcement misconduct, and corrections. Ms. Gunston was involved with investigations into the Cleveland Division of Police, the New Orleans Police Department, and the Chicago Police Department.

¹¹ Key ingredients are (1) Having leadership at a police department that is invested in implementation and for officers to believe that the work they’re doing will make them better at their jobs and positively impact communities. (2) Identifying a group of leaders within the police department who are tasked with implementing the reforms. (3) Building trusting relationships between the people crafting the reforms and the people outside the police departments who are implementing the reforms.

¹² Dr. Headley is an Assistant Professor in the McCourt School of Public Policy at Georgetown University, an Affiliate Fellow at the Center for Innovations in Community Safety at Georgetown Law. Formerly, she was a Visiting Scholar on Race, Policing and Crime at the National Police Foundation, an Assistant Professor in the John Glenn College of Public Affairs at The Ohio State University (OSU), and a UC President’s Postdoctoral Fellow in the Goldman School of Public Policy at the University of California, Berkeley.

¹³ ILET SB is the state agency mandated to promote and maintain a high level of professional standards for law enforcement and correctional officers; the agency provides training and standards for law enforcement. ILET SB is responsible for implementing certain parts of the SAFE-T Act. See www.ptb.illinois.gov.

¹⁴ ICJIA is a state agency dedicated to improving the administration of criminal justice in Illinois. ICJIA proposes and evaluates policies, programs, and legislation and works to ensure the criminal justice system in Illinois is efficient, effective, and equitable. ICJIA is responsible for implementing certain parts of the SAFE-T Act. See www.icjia.illinois.gov.

¹⁵ Mobile Team Units (MTU) are organizations “formed by a combination of units of local government...to deliver in-service training to local and state law enforcement officers...” An MTU is formed through an intergovernmental

agreement and typically includes the joint participation of two, to as many as one hundred, units of local government. It is a not-for-profit governmental entity directed and administered by an advisory board composed of local elected officials, local criminal justice administrators and the Director of the Illinois Law Enforcement Training and Standards Board. See <https://www.ptb.illinois.gov/training/mobile-team-units-mtus/>.

¹⁶ Live Free Illinois is led by Rev. Ciera Bates-Chamberlain, a member of the Workgroup. Live Free Illinois mobilizes Black churches to improve public safety and transform America's criminal justice system.

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<https://bjs.ojp.gov/sites/g/files/xyckuh236/files/media/document/cs1lea18st.pdf>.

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³⁶ Federal Bureau of Investigation, “Participation,” *FBI Crime Data Explorer*, n.d., <https://cde.ucr.cjis.gov/LATEST/webapp/#/pages/le/uof>; Illinois General Assembly, “Bill Status of HB3653,” 101st Illinois General Assembly, Feb. 22, 2021, <https://www.ilga.gov/legislation/billstatus.asp?DocNum=3653&GAID=15&GA=101&DocTypeID=HB&LegID=120371&SessionID=108&SpecSess=>.

³⁷ Zero reports are used for both mental health and use of force monthly reports, but not for death in custody reports.

³⁸ *Death in Custody Reporting Act of 2013*, Public Law 113-242, 2014, <https://www.congress.gov/bill/113th-congress/house-bill/1447/all-actions>; Illinois Criminal Justice Information Authority, “Illinois death in custody reporting,” *Illinois Criminal Justice Information Authority*, n.d., <https://icjia.illinois.gov/about/dicra/>.

³⁹ Mike Dolan Fliss, Jennifer Lao, Forrest Behne, & Lauren Brinkley-Rubinstein, “Few prison systems release individual death data: Death in Custody Reporting Act completeness, speed, and compliance,” *Journal of Public Health Management and Practice* 30, no. 3, (May/June 2024):424-428, <https://dx.doi.org/10.1097/PHH.0000000000001893>; Eva Ruth Moravec & Michael Everett, “Why Texas is a model for death-in-custody data reporting,” *UCLA Law COVID Behind Bars Data Project*, Mar. 24, 2023, <https://uclacovidbehindbars.org/texas-dcra-model>

⁴⁰ Illinois General Assembly, *Safety, Accountability, Fairness and Equity-Today Act*, PA 101-652, 101st Gen. Assembly, Feb. 22, 2021, 7, <https://www.ilga.gov/legislation/publicacts/101/PDF/101-0652.pdf#page=7>.

⁴¹ Illinois Criminal Justice Information Authority, “Illinois death in custody reporting,” *Illinois Criminal Justice Information Authority*, n.d., <https://icjia.illinois.gov/about/dicra/>.

⁴² According to the Uniform Crime Reporting team within the Illinois State Police, the transfer of responsibility from child agencies to parent agencies often means that child agencies are no longer expected to report data, because parent agency officers take on responsibility for patrolling and responding to calls for service. To leave room for an evolving understanding of in-covered agreements, the graphs, statistics, and visualizations included in the reporting

compliance section of this document will include totals both with and without child agencies included. The total number of agencies with child agencies included is 1107; without child agencies, the total is 982.

⁴³ Illinois Criminal Justice Information Authority, “Illinois death in custody reporting,” *Illinois Criminal Justice Information Authority*, n.d., <https://icjia.illinois.gov/about/dicra/>.

⁴⁴ ICJIA is conducting statistical testing to examine if there are agency characteristics that predict compliance.

⁴⁵ Assuming that all child agencies transfer responsibility for reporting to parent agencies when they enter an in-covered agreement, 982 agencies are expected to submit reports each month. The graphs on reporting requirements related to mental health dispatches and use of force incidents are scaled to reflect this assumption. Further research is necessary to determine which, if any, child law enforcement agencies in Illinois are responsible for their own reporting.

⁴⁶ The IDOC JDSU collects detainee population information from county jails each month and from municipal lockups each quarter. Illinois Department of Corrections, “Fiscal Year 2023 Annual Report,” *Illinois Department of Corrections*, 2023, <https://idoc.illinois.gov/content/dam/soi/en/web/idoc/reportsandstatistics/documents/annualreports/FY23-Annual-Report.pdf>.

⁴⁷ Illinois State Police, “Illinois uniform crime reporting I-UCR,” *Illinois State Police*, n.d., <https://ilucr.nibrs.com/>.

⁴⁸ Federal Bureau of Investigation, “Participation,” *FBI Crime Data Explorer*, n.d., <https://cde.ucr.cjis.gov/LATEST/webapp/#/pages/le/uof>.

⁴⁹ See, e.g., the definition and standard used in New Jersey for use of force reporting (a use of force incident involves physical force (contact with a subject beyond that which is generally utilized to effect an arrest or other law enforcement objective), mechanical force (the use of some device or substance, other than a firearm, to overcome a subject’s resistance to the exertion of the law enforcement officer’s authority), enhanced mechanical force (involves the use of a conducted energy device), deadly force, or any combination of these actions. New Jersey Office of the Attorney General, “Use of Force Reporting Guide,” *New Jersey Office of the Attorney General*, updated Jan. 2022, <https://www.nj.gov/oag/excellence/docs/Use-of-force-Reporting-Portal-Guide.pdf>.

⁵⁰ Illinois State Police, “Illinois uniform crime reporting I-UCR,” *Illinois State Police*, n.d., <https://ilucr.nibrs.com/>.

⁵¹ Ashley Abramson, “Building mental health into emergency responses,” *APA Monitor* 52, no. 5 (Jul. 1, 2021): 30, <https://www.apa.org/monitor/2021/07/emergency-responses>; Bureau of Justice Assistance and CSG Justice Center, “Police-mental health collaborations: A framework for implementing effective law enforcement responses for people who have mental health needs,” *Council of State Governments Justice Center*, Apr. 2019, <https://csgjusticecenter.org/wp-content/uploads/2020/02/Police-Mental-Health-Collaborations-Framework.pdf>; Amos Irwin & Betsy Pearl, “The community responder model,” *Center for American Progress*, Oct. 28, 2020, <https://www.americanprogress.org/article/community-responder-model/>; Police Executive Research Forum, “Rethinking the police response to mental health-related calls: Promising models,” *Police Executive Research Forum*, Oct. 2023, <https://www.policeforum.org/assets/MBHResponse.pdf>; Jennifer D. Wood, Amy C. Watson, & Anjali J. Fulambarker “The ‘Gray Zone’ of Police Work During Mental Health Encounters: Findings from an Observational Study in Chicago,” *Police quarterly* 20, no. 1 (Jul.13, 2016): 81–105, <https://doi.org/10.1177/1098611116658875>.

⁵² Amos Irwin & Rachael Eisenberg, “Dispatching community responders to 911 calls,” *Center for American Progress*, Dec. 13, 2023, <https://www.americanprogress.org/article/dispatching-community-responders-to-911-calls/>; Pew Charitable Trusts., “New research suggests 911 call centers lack resources to handle behavioral health crises,” *The Pew Charitable Trusts*, Oct. 26, 2021, <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2021/10/new-research-suggests-911-call-centers-lack-resources-to-handle-behavioral-health-crisis#:~:text=States%20Have%20Not%20Supported%20988%20Behavioral%20Health%20Lifeline&text=Most%20call%20911%2C%20though%20some,vary%20from%20region%20to%20region>.

⁵³ Amos Irwin & Rachael Eisenberg, “Dispatching community responders to 911 calls,” *Center for American Progress*, Dec. 13, 2023, <https://www.americanprogress.org/article/dispatching-community-responders-to-911-calls/>; Pew Charitable Trusts., “New research suggests 911 call centers lack resources to handle behavioral health crises,” *The Pew Charitable Trusts*, Oct. 26, 2021, <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2021/10/new-research-suggests-911-call-centers-lack-resources-to-handle-behavioral-health-crisis#:~:text=States%20Have%20Not%20Supported%20988%20Behavioral%20Health%20Lifeline&text=Most%20call%20911%2C%20though%20some,vary%20from%20region%20to%20region>.

⁵⁴ Illinois Criminal Justice Information Authority, “Illinois death in custody reporting,” *Illinois Criminal Justice Information Authority*, n.d., <https://icjia.illinois.gov/about/dicra/>; Illinois Criminal Justice Information Authority, “ICJIA Reporting of Deaths in Custody Form,” *Illinois Criminal Justice Information Authority*, n.d., https://icjia.az1.qualtrics.com/jfe/form/SV_d3Td2CbBrfCBAk6.

⁵⁵ There are multiple ways to report a death in custody to ICJIA that are utilized to different extents by many police and sheriffs' departments. Most deaths in police custody are reported to ISP as arrest-related deaths. Most deaths in sheriffs' custody are reported to the JDSU at IDOC, or to ISP as arrest-related deaths. ISP and IDOC partner with ICJIA to share data and reduce the reporting burden on law enforcement. Additionally, both sheriffs and police report some deaths directly to ICJIA using the qualtrics form on ICJIA's website.

⁵⁶ U.S. Senate Permanent Subcommittee on Investigations, "Uncounted deaths in America's prisons & jails: How the Department of Justice failed to implement the Death in Custody Reporting Act," *U.S. Senate Committee on Homeland Security & Government Affairs*, Sept. 20, 2022, <https://www.hsgac.senate.gov/>.

⁵⁷ Leadership Conference Education Fund and Project on Government Oversight, "A matter of life and death: The importance of the Death in Custody Reporting Act," *Project on Government Oversight*, Feb. 22, 2023, <https://www.pogo.org/reports/matter-of-life-and-death-the-importance-of-the-death-in-custody-reporting-act>; Leadership Conference on Civil and Human Rights., "New report highlights the urgent need to implement the Death in Custody Reporting Act," *The Leadership Conference on Civil and Human Rights*, Feb. 22, 2023, <https://civilrights.org/blog/new-report-highlights-the-urgent-need-to-implement-the-death-in-custody-reporting-act/>; Maayan Simckes, Dale W. Willits, A. Rowhani-Rahbar, & A. Hajat, "Lethal use of force surveillance: practical considerations for open-source database linkage," *Journal of Epidemiology and Community Health* 77, no. 8 (May 19, 2023): 543-548, <http://dx.doi.org/10.1136/jech-2022-219022>.

⁵⁸ ILETSB is required by law under the UCR Act to consider law enforcement agencies' compliance or lack thereof with the UCR Act's requirements as a factor in awarding body-worn camera grant funding. It also requires compliance with the UCR Act for all applicants for Recruitment and Retention grants. Illinois General Assembly, "Police and Community Relations Improvement Act," P.A. 99-352, 99th General Assembly, <https://www.ilga.gov/legislation/publicacts/99/099-0352.htm>.

⁵⁹ During the Workgroup sessions discussing the reporting data, members made additional suggestions, including providing technical assistance to the reporting departments, incentivizing data reporting, auditing data submitted and releasing a report, creating a guide to the reporting requirements, clarifying the responsibilities among agencies, especially between ICJIA and ISP, and reformatting data collection on deaths in custody through existing public health systems (e.g., adding a "death in custody" box to standard death certificate forms so there is health system data as well as justice system data).

⁶⁰ Ram Subramanian & Leily Arzy, "State Policing Reforms Since George Floyd's Murder," *Brennan Center for Justice*, May 21, 2021, <https://www.brennancenter.org/our-work/research-reports/state-policing-reforms-george-floyds-murder#:~:text=Despite%20pleas%20from%20onlookers%20for,an%20officer%27s%20custody%20or%20care>.

⁶¹ Center for Policing Equity, "Improving Use of Force Policy Community Toolkit," *Center for Policing Equity*, n.d., <https://policingequity.org/use-of-force/78-community-toolkit-use-of-force/file>.

⁶² Logan Seacrest & Jillian Snider, "Measured Force: The Benefits of Police Data Transparency," *R Street Policy Study* no. 302 (Apr. 2024): 1-26, <https://www.rstreet.org/wp-content/uploads/2024/04/FINAL-r-street-policy-study-no-302.pdf>.

⁶³ The Independent Monitoring Team noted that budget limitations in its investigation meant it could not obtain representative samples of respondents for other groups that typically have high rates of encounters with the police such as Latino men or Black women. For this reason, only data on the Black men surveyed's perspectives can be isolated. Independent Monitoring Team. 2023. *Community Survey Report: October 2021 – May 2022*. Chicago: Chicago Police Consent Decree. <https://www.chicagopoliceconsentdecree.org/Page-Attachments/CPCD/Resources/IMR/2023.05.30-IMT-Community-Survey-Report-October-2021-May-2022-filed.-2.pdf>.

⁶⁴ See table of state reforms regarding use of force, in State policing reforms since George Floyd's murder. Brennan Center for Justice. <https://www.brennancenter.org/our-work/research-reports/state-policing-reforms-george-floyds-murder#:~:text=Despite%20pleas%20from%20onlookers%20for,an%20officer%27s%20custody%20or%20care>

⁶⁵ National Institute of Justice, "Overview of Police Use of Force," March 5, 2020, [nij.ojp.gov](https://nij.ojp.gov/topics/articles/overview-police-use-force): <https://nij.ojp.gov/topics/articles/overview-police-use-force>

⁶⁶ <https://icjia.illinois.gov/researchhub/articles/an-overview-of-police-use-of-force-policies-and-research>

⁶⁷ International Association of the Chiefs of Police, *Police Use of Force in America*, 2001, Alexandria, Virginia, 2001

⁶⁸ *Graham v. Connor*, 490 U.S. 386 (1989)

⁶⁹ Police Executive Research Forum, "Guiding Principles on Use of Force," March 2016: <https://www.policeforum.org/assets/30%20guiding%20principles.pdf>

⁷⁰[https://www.theiacp.org/sites/default/files/2020-](https://www.theiacp.org/sites/default/files/2020-07/National_Consensus_Policy_On_Use_Of_Force%2007102020%20v3.pdf)

07/National_Consensus_Policy_On_Use_Of_Force%2007102020%20v3.pdf

⁷¹ Illinois General Assembly, *Safety, Accountability, Fairness and Equity-Today Act*, PA 101-652, 101st Gen. Assembly, Feb. 22, 2021, 1, <https://www.ilga.gov/legislation/publicacts/101/PDF/101-0652.pdf>.

⁷² Illinois General Assembly, *Safety, Accountability, Fairness and Equity-Today Act*, PA 101-652, 101st Gen. Assembly, Feb. 22, 2021, 285, <https://www.ilga.gov/legislation/publicacts/101/PDF/101-0652.pdf#page=285>.

⁷³ Illinois General Assembly, *Safety, Accountability, Fairness and Equity-Today Act*, PA 101-652, 101st Gen. Assembly, Feb. 22, 2021, 287, <https://www.ilga.gov/legislation/publicacts/101/PDF/101-0652.pdf#page=287>.

⁷⁴ Illinois General Assembly, *Safety, Accountability, Fairness and Equity-Today Act*, PA 101-652, 101st Gen. Assembly, Feb. 22, 2021, 289, <https://www.ilga.gov/legislation/publicacts/101/PDF/101-0652.pdf#page=289>.

⁷⁵ The Civic Federation, “Summary of Provisions in Illinois House Bill 3653: Criminal Justice Omnibus Bill,” *The Civic Federation*, Feb. 15, 2021, <https://www.civicfed.org/iifs/blog/summary-provisions-illinois-house-bill-3653-criminal-justice-omnibus-bill>.

⁷⁶ Impact for Equity is a Chicago-based public interest law and policy center that is committed to addressing the structural racism and systemic oppression that has led to inequities and injustices, particularly for people and communities of color, in Chicago and Illinois. Loren Jones, Ariel Hairston, & Joi Imobhio, “Illinois Law Enforcement Agencies Unevenly Implemented New Use of Force Provisions,” *Impact for Equity*, Apr. 2024, <https://www.impactforequity.org/wp-content/uploads/2024/04/Issue-Brief-Use-of-force-SAFE-T-Act.pdf>

⁷⁷ IFE provided the following examples: Multiple written policies failed to state that officers cannot use deadly force against a person who is only in danger of harming themselves; one agency did not include any of the prohibitions on using force in its use of force policy at all.

⁷⁸ Best practice dictates that law enforcement policies, especially on the use of force, should be made publicly available, typically on the agency’s website. When asked during the virtual listening sessions, around 40% of participants indicated their agency published their use of force policy; 40% of participant agencies did not; and 20% were not sure. Center for Policing Equity, “Improving Use of Force Policy Community Toolkit,” *Center for Policing Equity*, n.d., <https://policingequity.org/use-of-force/78-community-toolkit-use-of-force/file>.

⁷⁹ Ben Miller, “Data Pinpoints the Moment When Police Body Cameras Took Off,” *Government Technology*, Jan. 4, 2019, <https://www.govtech.com/data/data-pinpoints-the-moment-when-police-body-cameras-took-off.html>.

⁸⁰ Tolulope Sogade, “Body-Worn Camera Footage Retention and Release,” *Columbia Law Review* 122, no. 6 (Oct. 2022): 1729-1768, https://www.jstor.org/stable/27171761?read-now=1&oauth_data=eyJlbWFpbCI6Im1hcmRhcml6V0QGl5anAub3JnIiwiaW5zdG10dXRpb25JZHMlOltLCjwcm92aWRlcil6Imdvb2dsZSJ9&seq=3#page_scan_tab_contents.

⁸¹ Cynthia Lum, “Police body cameras: What have we learned over ten years of deployment?,” *National Policing Institute*, Jun. 2020, <https://www.policinginstitute.org/publication/police-body-cameras-what-have-we-learned-over-ten-years-of-deployment/>.

⁸² Cynthia Lum, “Police body cameras: What have we learned over ten years of deployment?,” *National Policing Institute*, Jun. 2020, <https://www.policinginstitute.org/publication/police-body-cameras-what-have-we-learned-over-ten-years-of-deployment/>.

⁸³ Cynthia Lum, “Police body cameras: What have we learned over ten years of deployment?,” *National Policing Institute*, Jun. 2020, <https://www.policinginstitute.org/publication/police-body-cameras-what-have-we-learned-over-ten-years-of-deployment/>.

⁸⁴ Cynthia Lum, “Police body cameras: What have we learned over ten years of deployment?,” *National Policing Institute*, Jun. 2020, <https://www.policinginstitute.org/publication/police-body-cameras-what-have-we-learned-over-ten-years-of-deployment/>.

⁸⁵ Andrea M. Headley, “Police Use of Body Cameras – What They Can and Cannot Achieve,” *Georgetown University McCourt School of Public Policy*, May 12, 2021, <https://mccourt.georgetown.edu/news/police-use-of-body-cameras-what-they-can-and-cannot-achieve/>.

⁸⁶ Illinois General Assembly, *Law Enforcement Officer-Worn Body Camera Act*, 50 ILCS 706/, 99th Illinois General Assembly, Jan. 1, 2016, <https://www.ilga.gov/legislation/ilcs/ilcs5.asp?ActID=3662&ChapterID=11>.

⁸⁷ Andrea Dantus & Amy Thompson, “Assessing the Promise of Body-Worn Cameras,” *Impact for Equity*, Feb. 2024, <https://www.impactforequity.org/wp-content/uploads/2024/02/Issue-Brief-SAFE-T-Act-BWC.pdf>

⁸⁸ Officers are also permitted to turn off their BWCs while speaking with confidential informants. Illinois General Assembly, *Law Enforcement Officer-Worn Body Camera Act*, 50 ILCS 706/, 99th Illinois General Assembly, Jan. 1, 2016, <https://www.ilga.gov/legislation/ilcs/ilcs5.asp?ActID=3662&ChapterID=11>.

⁸⁹ Illinois General Assembly, *Law Enforcement Officer-Worn Body Camera Act*, 50 ILCS 706/, 99th Illinois General Assembly, Jan. 1, 2016, <https://www.ilga.gov/legislation/ilcs/ilcs5.asp?ActID=3662&ChapterID=11>.

⁹⁰ Andrea Dantus & Amy Thompson, “Assessing the Promise of Body-Worn Cameras,” *Impact for Equity*, Feb. 2024, <https://www.impactforequity.org/wp-content/uploads/2024/02/Issue-Brief-SAFE-T-Act-BWC.pdf>.

⁹¹ Illinois Municipal League, “Officer Body-Worn Cameras Effective July 1, 2021,” *Illinois Municipal League*, Jul. 29, 2024, <https://www.iml.org/file.cfm?key=21580>.

⁹² Agency deadlines to comply with the BWC mandate are as follows: municipalities and counties with a population of 500,000 or more, by January 1, 2022; municipalities and counties with a population of 100,000 or more but under 500,00, by January 1, 2023; municipalities and counties with a population of 50,000 or more but under 100,000, by January 1, 2024; municipalities and counties with a population under 50,000 by January 1, 2025; and all “other remaining law enforcement agencies” and state agencies with law enforcement officers, by January 1, 2025.

⁹³ Illinois Municipal League, “Officer Body-Worn Cameras Effective July 1, 2021,” *Illinois Municipal League*, Jul. 29, 2024, <https://www.iml.org/file.cfm?key=21580>.

⁹⁴ Illinois General Assembly, *Safety, Accountability, Fairness and Equity-Today Act*, PA 101-652, 101st Gen. Assembly, Feb. 22, 2021, 79, <https://www.ilga.gov/legislation/publicacts/101/PDF/101-0652.pdf#page=79>.

⁹⁵ Illinois Municipal League, “Officer Body-Worn Cameras Effective July 1, 2021,” *Illinois Municipal League*, Jul. 29, 2024, <https://www.iml.org/file.cfm?key=21580>.

⁹⁶ Illinois General Assembly, *Safety, Accountability, Fairness and Equity-Today Act*, PA 101-652, 101st Gen. Assembly, Feb. 22, 2021, 83, <https://www.ilga.gov/legislation/publicacts/101/PDF/101-0652.pdf#page=83>.

⁹⁷ Illinois Law Enforcement Training and Standards Board, “Basic Guidelines for Officer-Worn Body Cameras,” *Illinois Law Enforcement Training and Standards Board*, revised December 2024, <https://www.ptb.illinois.gov/media/1875/body-camera-basic-guidelines-2024-12.pdf>.

⁹⁸ Illinois Law Enforcement Training and Standards Board, “Illinois 2023 Body Worn Camera Report,” *Illinois Law Enforcement Training and Standards Board*, 2023, <https://www.ptb.illinois.gov/media/1849/2023-body-worn-camera-report-final.pdf>.

⁹⁹ At a Workgroup meeting, law enforcement reported that the full cost of BWCs is about \$1,500/year per sworn member of the department. However, this does not include personnel needed to respond to FOIA requests or any infrastructure for new technology capacity.

¹⁰⁰ According to participants from a listening session: “The hardest part was getting the appropriate info from Axon to satisfy ILETSB's needs.” “Our concerns with the grant process has been the fact that most camera programs are set up on lease programs which include the cost of the cameras and data storage, then you have to jump through terrible hoops trying to get the vendor to try to separate out the cost of the equipment, etc.” “We bought the bundle as well, which included software, storage, redaction capabilities, etc. It's nearly impossible to separate all that out.”

¹⁰¹ National Conference of State Legislatures, “Law Enforcement Training,” *National Conference of State Legislatures*, Jun. 18, 2024, <https://www.ncsl.org/civil-and-criminal-justice/law-enforcement-training>.

¹⁰² Officer wellness and mental health was previously only required every 3 years; it is now required annually.

¹⁰³ The news release stated: “Interim Executive Director Keith Calloway announces the ‘minimum in-service training standards’ required by the Illinois Police Training Act (50 ILCS 705/10.6). He states, “Establishing these guidelines will allow agencies and officers throughout the state to not only better prepare their training schedules in both the long-term and short-term, but also assist and allow our profession to continue its evolution in striving to provide the highest level of professionalism with an exemplary standard of training.” The SAFE-T Act requires the board to adopt rules and minimum standards for in-service training requirements as set forth within the Act. Please click [here](#) to review these standards.” Found at Illinois Law Enforcement Training and Standards Board, “Minimum In-Service Training Requirements Released,” *Illinois Law Enforcement Training and Standards Board*, n.d., <https://www.ptb.illinois.gov/news/news-important-information/minimum-in-service-training-requirements-released/>.

¹⁰⁴ See Illinois Law Enforcement Training and Standards Board, “Board Approved Guidelines,” *Illinois Law Enforcement Training and Standards Board*, adopted Sept. 9, 2021, <https://www.nemrt.com/downloads/ILETSB%20In-Service%20Mandated%20Training%20Guidelines%20Jan%202022.pdf>.

¹⁰⁵ Mobile Team Units (MTU) are organizations “formed by a combination of units of local government...to deliver in-service training to local and state law enforcement officers...” An MTU is formed through an intergovernmental agreement and typically includes the joint participation of two, to as many as one hundred, units of local government. It is a not-for-profit governmental entity directed and administered by an advisory board composed of local elected officials, local criminal justice administrators and the Director of the Illinois Law Enforcement Training and Standards Board. See Illinois Law Enforcement Training and Standards Board, “Mobile Team Units (MTUs),” *Illinois Law Enforcement Training and Standards Board*, n.d., <https://www.ptb.illinois.gov/training/mobile-team-units-mtus/>.

¹⁰⁶ The NEMRT representative informed people to reach out to their registrar at terri@nemrt.com or 630-896-8860, x102 for help registering for booked classes. See www.nemrt.com.

¹⁰⁷ Illinois General Assembly, *Illinois Police Training Act*, 50 ILCS 705/, P.A. 101-652, 101st Illinois General Assembly, effective Jan. 1, 2022, <https://www.ilga.gov/legislation/publicacts/101/101-0652.htm>.

¹⁰⁸ Loren Atherley & Matthew Hickman, “Officer Decertification and the National Decertification Index,” *Police Quarterly* 16, no. 4 (Dec. 2013): 420-437, <https://doi.org/10.1177/1098611113489889>; Ariel Hairston & Amy Thompson, “Two Years Since Taking Effect, Illinois’s New Police Officer Decertification Process is Stalled,” *Impact for Equity*, May 2024, <https://www.impactforequity.org/wp-content/uploads/2024/05/Issue-Brief-SAFE-T-Act-Decertification.pdf>.

¹⁰⁹ Loren Atherley & Matthew Hickman, “Officer Decertification and the National Decertification Index,” *Police Quarterly* 16, no. 4 (Dec. 2013): 420-437, <https://doi.org/10.1177/1098611113489889>; Ariel Hairston & Amy Thompson, “Two Years Since Taking Effect, Illinois’s New Police Officer Decertification Process is Stalled,” *Impact for Equity*, May 2024, <https://www.impactforequity.org/wp-content/uploads/2024/05/Issue-Brief-SAFE-T-Act-Decertification.pdf>.

¹¹⁰ National Conference of State Legislatures, “Developments in Law Enforcement Officer Certification and Decertification,” *National Conference of State Legislatures*, Feb. 17, 2023, <https://www.ncsl.org/civil-and-criminal-justice/developments-in-law-enforcement-officer-certification-and-decertification>.

¹¹¹ Ram Subramanian & Leily Arzy, “State Policing Reforms Since George Floyd’s Murder,” *Brennan Center for Justice*, May 21, 2021, <https://www.brennancenter.org/our-work/research-reports/state-policing-reforms-george-floyds-murder#:~:text=Despite%20pleas%20from%20onlookers%20for,an%20officer%27s%20custody%20or%20care>.

¹¹² National Conference of State Legislatures, “Developments in Law Enforcement Officer Certification and Decertification,” *National Conference of State Legislatures*, Feb. 17, 2023, <https://www.ncsl.org/civil-and-criminal-justice/developments-in-law-enforcement-officer-certification-and-decertification>.

¹¹³ National Conference of State Legislatures, “Developments in Law Enforcement Officer Certification and Decertification,” *National Conference of State Legislatures*, Feb. 17, 2023, <https://www.ncsl.org/civil-and-criminal-justice/developments-in-law-enforcement-officer-certification-and-decertification>.

¹¹⁴ National Conference of State Legislatures, “Developments in Law Enforcement Officer Certification and Decertification,” *National Conference of State Legislatures*, Feb. 17, 2023, <https://www.ncsl.org/civil-and-criminal-justice/developments-in-law-enforcement-officer-certification-and-decertification>.

¹¹⁵ A list of the misdemeanors eligible for automatic decertification is available from ILETSB. See Illinois Law Enforcement Training and Standards Board, “Decertification,” *Illinois Law Enforcement Training and Standards Board*, n.d., <https://www.ptb.illinois.gov/resources/decertification/>.

¹¹⁶ *Feiza v. Ill.*, Law Enft Training & Stds. Bd., 2023 U.S. Dist. LEXIS 171451 (ruling that deferred prosecution is a similar disposition equal to a conviction, and due process requires that the Board must provide notice to the employee and provide them with a chance to respond in writing prior to decertification).

¹¹⁷ These updates were provided by ILETSB at the Workgroup meetings in August, September, and October 2024.

¹¹⁸ Form Q is available here: <https://www.ptb.illinois.gov/media/1737/notice-of-violation.pdf>

¹¹⁹ Information about the public meetings, along with the recordings and presentation, can be found here: <https://www.ptb.illinois.gov/>. The draft rules can be found here: <https://www.ptb.illinois.gov/media/1858/20-1790rg-p.pdf>.

¹²⁰ Associated Press, “After Floyd’s Death, Minneapolis Overhauls How Police Are Used in Schools,” *AP News*, February 27, 2022, <https://apnews.com/article/death-of-george-floyd-amir-locke-richmond-minneapolis-86370ae1c735d44525e37eed80b293b2>.

¹²¹ Sean Golonka Leonard, “Nevada Launches Statewide Use-of-Force Dashboard Two Years After Legislative Mandate,” *The Nevada Independent*, August 23, 2023, <https://thenevadaindependent.com/article/nevada-launches-statewide-use-of-force-dashboard-two-years-after-legislative-mandate>.

¹²² Bureau of Justice Statistics (BJS), “Justice Expenditure and Employment Tool (JEET),” *U.S. Department of Justice*, Office of Justice Programs, <https://bjs.ojp.gov/jeet>.

¹²³ Urban Institute, “Criminal Justice Expenditures: Police, Corrections, and Courts,” *Urban Institute*, <https://www.urban.org/policy-centers/cross-center-initiatives/state-and-local-finance-initiative/state-and-local-backgrounders/criminal-justice-police-corrections-courts-expenditures>.

¹²⁴ Bureau of Justice Statistics (BJS), “Justice Expenditure and Employment Tool (JEET),” *U.S. Department of Justice*, Office of Justice Programs, <https://bjs.ojp.gov/jeet>.

¹²⁵ National Police Funding Database, “Illinois,” NAACP Legal Defense and Educational Fund Thurgood Marshall Institute, updated 2023, Jun. 11, 2024, Jan. 15, 2023, Sept. 6, 2022, <https://policefundingdatabase.org/explore-the-database/locations/illinois/>.



WORKGROUP TO IMPLEMENT THE SAFE-T ACT POLICING PROVISIONS



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