

# **Workgroup to Implement the SAFE-T Act Policing Provisions: Implementation Recommendations**

April 2026

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**Center for  
Effective  
Public Policy**

**ILJP**  
Illinois Justice Project

# Table of Contents

**Letter from the Illinois Justice Project ..... 1**

**Executive Summary ..... 3**

**List of Abbreviations ..... 6**

**Introduction .....7**  
    The SAFE-T Act Policing Provisions Implementation Workgroup.....7

**Developing the Recommendations..... 8**

**Implementation Recommendations..... 9**  
    Reporting Requirements .....9  
    Use of Force Standards.....13  
    Body-Worn Cameras.....17  
    Training Practices .....22  
    Discretionary Decertification.....27

**Foundations for Continued Implementation ..... 31**  
    State-Level Communication and Coordination.....32  
    State–Local Feedback Loops .....32  
    Public Communication and Community Engagement.....33  
    Ongoing Implementation Oversight and Coordination .....33  
    Clarifying ILETB’s Role and Authority .....34  
    Funding Flexibility and Alignment .....34

**Conclusion ..... 34**

**Appendix A: Workgroup Co-Chairs, Member Organizations, and Individual Members..... 36**

**Appendix B: Subcommittee Co-Chairs and Member Organizations ..... 39**

**Appendix C: Strategic Implementation Steps ..... 42**  
    Reporting Requirements Recommendations .....42  
    Use of Force Standards Recommendations.....44  
    Body-Worn Cameras Recommendations.....45  
    Training Practices Recommendations .....46  
    Discretionary Decertification Recommendations.....48

## Letter from the Illinois Justice Project

Since its establishment in February 2024, the Workgroup to Implement the SAFE-T Act Policing Provisions convened regularly under the charge to: (1) assess the state’s progress in implementing the law’s policing provisions and (2) provide implementation support where needed. Following the first phase of its work, the Workgroup released an [initial report in April 2025 assessing the implementation status of the law](#). The report found that implementation was still a work in progress and compliance across the law’s provisions remained uneven.

The implementation recommendations in this report build upon the findings of the Workgroup’s first report, focusing on actions that support the ongoing work to fully implement the law by strengthening the state’s decertification system to remove officer certification after serious misconduct; ensuring complete and consistent use of force policies aligned with best practices; improving compliance with reporting requirements of accurate and timely department information; supporting officer compliance with training requirements aligned with community expectations; and ensuring body-worn camera mandates promote accountability and transparency. The recommendations were developed by subcommittees whose members were from the same stakeholder groups as the members of the Workgroup and reflect feedback from community members convened in several regions across the state. All recommendations were reviewed by Workgroup members, whose pertinent comments are incorporated into the report.

It is not lost on us that this work would not have been possible without the leadership of the workgroup Co-chairs – Senator Elgie R. Sims, Jr., Senator Robert Peters, and Representative Justin Slaughter and the sustained commitment of Workgroup members, which include representatives from the Offices of the Governor, Lt. Governor and the Attorney General; state agencies; law enforcement leaders and criminal legal system stakeholders from across the state; advocates; and academics, who dedicated their time and expertise over several months to inform the recommendations in this report. In this same spirit, we are grateful to the Center for Effective Public Policy (CEPP) for their exceptional project management and leadership in helping to drive this work forward in ways that meaningfully advanced implementation progress. We give special thanks to the Joyce Foundation and an anonymous donor for your support of the Workgroup. And we thank all workgroup members who contributed their expertise and countless hours of service to effectuating the law’s policing provisions. As demonstrated by this effort, when we work together to ensure a law is effectively implemented, the gap between its intentions and its execution can be meaningfully reduced. We also recognize that sustaining implementation momentum is just as critical to ensuring that progress is not lost.

To that end, we are grateful for the Governor’s Office leaders who, with support from the Illinois Justice Project, will lead the next phase of our work: ongoing monitoring of implementation. Under the leadership of the Deputy Governor for Public Safety, Infrastructure, Environment, and Energy this workgroup will bring together the state leaders and agencies responsible for advancing various aspects of the SAFE-T Act’s policing provisions in partnership with community stakeholders. We look forward to

building on our progress and remain committed to ensuring that the recommendations in this report for improving implementation are realized and positively experienced by local departments and community members across the state.

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 ushered in extensive criminal justice reforms across policing, pretrial processes, sentencing, and corrections. The law seeks to enhance public safety and strengthen trust between Illinois’ more than 800 law enforcement agencies and local communities, particularly Black communities that have been disproportionately impacted by the criminal justice system.

In 2024, Illinois State Senator Elgie Sims, Jr., Senator Robert Peters, and Representative Justin Slaughter convened the Workgroup to Implement the SAFE-T Act Policing Provisions (also known as the “SAFE-T Act Workgroup” or “Workgroup”) to assess the status of the Act’s policing provisions and support their effective, consistent statewide implementation. The Workgroup focused on five priority policing provisions: (1) reporting requirements, (2) use of force standards, (3) body-worn cameras, (4) training practices, and (5) discretionary decertification. In April 2025, they released their findings in the [\*Workgroup to Implement the SAFE-T Act Policing Provisions: Preliminary Assessment Report on Implementation\*](#).

Following the release of that report, the Workgroup began its second phase: developing recommendations to address the identified implementation challenges. Subcommittees were established for each priority policing provision. Each subcommittee convened a diverse group of participants, including leaders and practitioners from law enforcement, state agencies, community-based organizations, and advocacy groups, as well as nonaffiliated community representatives. Over a four-month period, from June through September 2025, subcommittees met virtually every month and engaged in a highly collaborative process to address complex implementation challenges and identify realistic solutions that can work in a range of local settings. This report represents the culmination of their efforts.

The following recommendations were developed to strengthen implementation of the five priority policing revisions:

Policy Area	Recommendation	Description	Responsible/Collaborating Agency
<b>Reporting Requirements</b>	Recommendation 1	Verify the active agency list	ILETSB, ICJIA, ISP, Loyola University
	Recommendation 2	Improve the compliance rate	ICJIA, ILETSB, ISP, Sheriffs
	Recommendation 3	Clarify definitions and create incentives to promote consistent reporting	ISP, ICJIA, ILETSB
	Recommendation 4	Create regular reports and notifications from submitted data	ICJIA, ISP

Policy Area	Recommendation	Description	Responsible/Collaborating Agency
<b>Use of Force Standards</b>	Recommendation 1	Develop a statewide model use of force (UOF) policy	ILETSB, ILACP
	Recommendation 2	Enhance the ILETSB portal for voluntary policy upload and statutory attestation	ILETSB
	Recommendation 3	Publish plain language policy updates and seek community input where feasible	ILETSB, local agencies

Policy Area	Recommendation	Description	Responsible/Collaborating Agency
<b>Body-Worn Cameras</b>	Recommendation 1	Promote access to FOIA training and guidance on BWC requests	OPAC, ILETSB, IL Sheriffs' Association, ILACP
	Recommendation 2	Widely distribute ILETSB grant information	ILETSB
	Recommendation 3	Create a template BWC webpage for law enforcement agencies	ILETSB

Policy Area	Recommendation	Description	Responsible/Collaborating Agency
<b>Training Practices</b>	Recommendation 1	Adopt interactive learning tools	ILETSB, MTUs, training academies
	Recommendation 2	Conduct a comprehensive cost and funding analysis	ILETSB, ICJIA, GOMB
	Recommendation 3	Create a public dashboard to share aggregated training data	ILETSB, MTUs, training academies
	Recommendation 4	Develop clear, standardized descriptions for all mandated training courses	ILETSB, MTUs, training academies
	Recommendation 5	Develop statewide guidance for incorporating community perspectives into training	Monitoring Workgroup

Policy Area	Recommendation	Description	Responsible/Collaborating Agency
<b>Discretionary Decertification</b>	Recommendation 1	Standardize the intake process and provide officers with timely information	ILETSB
	Recommendation 2	Develop a public decertification dashboard, improve the officer lookup tool, and provide regular briefings	ILETSB
	Recommendation 3	Coordinate with the Attorney General's Office on legislative cleanup efforts	Monitoring Workgroup, AG's Office

This report also draws on implementation science to identify critical steps to ensure the consistency, coordination, and sustainability of implementation across the state. Ultimately, this report is intended to guide ongoing improvement efforts and promote the development of the statewide infrastructure needed to support effective, sustainable implementation.

## List of Abbreviations

AGO	Attorney General’s Office
ALJ	Administrative Law Judge
BWC	Body-worn camera
CEPP	Center for Effective Public Policy
CIT	Crisis Intervention Team
FBI	Federal Bureau of Investigation
FOIA	Freedom of Information Act
GOMB	Governor’s Office of Management and Budget
ICJIA	Illinois Criminal Justice Information Authority
ILACP	Illinois Association of Chiefs of Police
ILETSB	Illinois Law Enforcement Training and Standards Board
ILJP	Illinois Justice Project
ISP	Illinois State Police
I-UCR	Illinois State Police Uniform Crime Reporting
MTU	Mobile Team Unit
NIBRS	National Incident-Based Reporting System
OPAC	Office of the Public Access Counselor
SAFE-T Act	Safety, Accountability, Fairness and Equity-Today Act
UOF	Use of force

## Introduction

The Safety, Accountability, Fairness and Equity–Today Act (SAFE-T Act) was enacted in 2021 and is a comprehensive criminal justice reform law that brought extensive changes to policing, pretrial processes, sentencing, and corrections.<sup>1</sup> Its stated purpose is to enhance public safety and strengthen trust between law enforcement and communities, particularly Black communities that have been disproportionately impacted by the criminal justice system.<sup>2</sup>

Many SAFE-T Act measures are intended to improve police accountability. The relevant provisions include enhanced reporting requirements for use of force and deaths in custody, updated use of force standards, mandatory body-worn cameras, expanded training mandates, revised processes for decertifying officers, and new systems to monitor police misconduct.

### THE SAFE-T ACT POLICING PROVISIONS IMPLEMENTATION WORKGROUP

Recognizing the scope and complexity of the law and aiming to support the effective implementation of the policing provisions of the SAFE-T Act, Illinois State Senator Elgie Sims, Jr., Senator Robert Peters, and Representative Justin Slaughter formed the Workgroup to Implement the SAFE-T Act Policing Provisions (also known as the “SAFE-T Act Workgroup” or “Workgroup”) in February 2024. The Workgroup’s goal is to evaluate the progress of the Act’s policing provisions and promote their consistent and effective statewide application.

The Workgroup is managed by the Illinois Justice Project (ILJP), which contracted with the Center for Effective Public Policy (CEPP) to provide technical assistance and support. Membership includes representatives from state and local law enforcement agencies, community advocates and organizations, and academic institutions, ensuring broad and diverse perspectives (see Appendix A for a list of Workgroup co-chairs and member organizations).

The Workgroup identified five priority SAFE-T Act policing provisions for focused assessment: **(1) reporting requirements, (2) use of force standards, (3) body-worn cameras, (4) training practices, and (5) discretionary decertification.**

#### PHASE 1: IMPLEMENTATION ASSESSMENT

During its first phase of work (February 2024–April 2025), the Workgroup conducted a comprehensive assessment to gauge progress in implementing each priority provision. This phase included regular Workgroup meetings, presentations from national policing experts, updates from Workgroup members on implementation efforts, a statewide survey of law enforcement agencies, and a series of listening

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<sup>1</sup> The SAFE-T Act became law on February 22, 2021, and was subsequently amended through three trailer bills in June 2021, January 2022, and December 2022. The Act established different effective dates for its provisions, with the final effective date of January 1, 2025, by which time all Illinois law enforcement agencies were required to comply with the body-worn camera mandate.

<sup>2</sup> See <https://www.ilchiefs.org/assets/2022Facts/Update%20report%20on%20SAFE-T%20Act%20May%202022.pdf>.

sessions with law enforcement personnel and, separately, community members. The [\*Workgroup to Implement the SAFE-T Act Policing Provisions: Preliminary Assessment Report on Implementation\*](#) (also referred to as the “*Assessment Report*” or “assessment process”) documents the assessment findings and was released in April 2025.<sup>3</sup>

## PHASE 2: DEVELOPMENT OF RECOMMENDATIONS

Following the release of the *Assessment Report*, the Workgroup began its second phase of work, spanning April 2025–March 2026, to develop recommendations to address the identified implementation challenges.

This report represents the culmination of the Workgroup’s efforts to develop actionable, practical recommendations to strengthen implementation of the five priority policing provisions across the state. It describes the process of developing recommendations and outlines provision-specific recommendations. This report also draws on implementation science to identify steps critical to ensuring the consistency, coordination, and sustainability of implementation across the state. Ultimately, this report is intended to guide ongoing improvement efforts and promote the development of the statewide infrastructure needed to support effective, sustainable implementation.

## Developing the Recommendations

The SAFE-T Act Workgroup established a subcommittee for each priority policing provision. Each subcommittee convened a diverse group of participants, including leaders and practitioners from law enforcement, state agencies, community-based organizations, and advocacy groups, as well as nonaffiliated community representatives. Subcommittees were chaired by one or two members, at least one of whom also served on the SAFE-T Act Workgroup to provide continuity across the initiative. Subcommittee sizes ranged from 16 to 32 members, with several individuals contributing their perspectives and expertise across multiple subcommittees. (See Appendix B for a list of subcommittee co-chairs and member organizations.)

Over a four-month period, from June through September 2025, subcommittees met virtually every month and engaged in a highly collaborative process. Members came prepared, reviewed background materials, and shared insights from their jurisdictions and communities. While CEPP facilitated the subcommittee process, with support from ILJP, the substance and direction of the work were driven by the members themselves. Through dialogue with subject-matter experts and fellow subcommittee members, they addressed complex implementation challenges and identified realistic solutions that can work in a range of local settings.

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<sup>3</sup> The report can be accessed at [https://iljp.org/wp-content/uploads/2025/07/Assessment-Report\\_7.8\\_final.pdf](https://iljp.org/wp-content/uploads/2025/07/Assessment-Report_7.8_final.pdf).

Recommendations were developed iteratively through discussion, consensus-building, and regular feedback from the SAFE-T Act Workgroup and the broader community. With support from Live Free Illinois,<sup>4</sup> a Workgroup member organization, community listening sessions were held in Waukegan and Kankakee, Illinois, in September 2025. The purpose of these sessions was to promote transparency and confirm that the draft recommendations reflected community priorities. Community input emphasized the need for clearer public information about discretionary decertification processes, greater transparency in use of force reporting, and accessible, publicly available updates on implementation progress. Participants also expressed interest in ongoing forums where community members can ask questions and engage with agencies about the SAFE-T Act’s policing provisions and their implementation.

Workgroup members also had the opportunity to review and provide feedback on this final report. While the Workgroup strove to reach consensus on every recommendation, this was not always possible. Where this occurred, differing perspectives are noted. Overall, the process reflected shared ownership and mutual respect, resulting in recommendations grounded in real-world practice and responsive to the needs of jurisdictions across Illinois.

## Implementation Recommendations

This section outlines the Workgroup’s recommendations for strengthening implementation of the five priority policing provisions: (1) reporting requirements, (2) use of force standards, (3) body-worn cameras, (4) training practices, and (5) discretionary decertification. For context, each subsection also summarizes the relevant SAFE-T Act requirements, corresponding assessment findings from the Workgroup’s initial report, and progress made toward implementation.

Detailed strategic steps for implementing each recommendation, including broad actions, descriptions of what they entail, and the suggested responsible agencies and their partners, are provided in Appendix C. Responsible agencies have reviewed and agreed with the recommendations and strategic steps.

### REPORTING REQUIREMENTS

The SAFE-T Act contains multiple provisions mandating law enforcement data reporting. The *Assessment Report* and this report focus on required reporting related to 911 law enforcement dispatches responding to mental health incidents, use of force incidents, and deaths in custody. These reporting requirements are intended to increase police accountability and transparency, particularly in cases involving the use of force.

At a high level, the SAFE-T Act requires:

- **Monthly reporting on mental health incidents**, where a law enforcement officer was dispatched to deal with a person experiencing a mental health incident or crisis.

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<sup>4</sup> Live Free Illinois is a state chapter of Live Free USA that mobilizes Black churches to improve public safety and transform the criminal justice system. For more information, visit <https://livefreeillinois.org/#home>.

- **Monthly reporting 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.
- **Death-in-custody reports**, when a person dies while in the custody of a law enforcement department, a local or state correctional facility, or a peace officer, aligning closely with the federal standards established in the Death in Custody Reporting Act.

## REPORTING: IMPLEMENTATION CHALLENGES AND PROGRESS

As part of the assessment, the Illinois Criminal Justice Information Authority (ICJIA) reviewed the 2022 and 2023 reporting history of over 800 Illinois law enforcement agencies. The review showed that, overall, compliance with reporting requirements was low across three key areas: mental health dispatches, use of force, and deaths in custody. The challenges in reporting, along with some initial steps to address them, are summarized below.

### Lack of Accurate State Compliance Rates

Considering the preliminary findings and to better understand the extent of noncompliance, the Reporting Subcommittee requested that ICJIA update its analysis using 2024 reporting data. The updated analysis revealed improved compliance across the state, with most departments in compliance and a few departments having never reported. It appears that it took departments time to become aware of and comply with the SAFE-T Act reporting requirements.

It was also discovered during subcommittee member outreach to a sample of nonreporting agencies that some of these agencies may have been dissolved, meaning inactive departments may have been included in the earlier analysis and indicated as noncompliant. Subcommittee members concluded that there may be a discrepancy between the list of active agencies used by ICJIA to determine the overall state rate of compliance and the list of agencies maintained by ILETSB, which could affect the overall state rate.

### Noncompliant and Inconsistent Reporting

As noted above, four years after the passage of the SAFE-T Act, a small percentage of departments have never reported or reported inconsistently. Contributing factors may include staff capacity issues, such as turnover among individuals responsible for submitting reports, and a lack of awareness by successors or leadership of the requirements. This is particularly problematic when notifications or prompts are sent only to one staff member who either permanently or temporarily leaves their position.

In addition, the SAFE-T Act reporting requirements represent only a small fraction of the broader law enforcement reporting requirements. Law enforcement indicated that some departments, particularly smaller ones that lack civilian staff and have limited sworn officers to assume reporting responsibilities, must prioritize these competing requirements and may not have the capacity to consistently submit timely data for all of them. Multiple portals through which the larger scope of reporting requirements must be submitted add to the administrative burden. Since there is no mechanism to enforce reporting,

agencies that are not reporting or that are reporting inconsistently may lack an incentive to improve compliance or may prioritize other mandates over reporting.

### Lack of Clarity and Guidance

Law enforcement feedback indicated a lack of clear, consistent communication and direction regarding the reporting requirements from agencies responsible for receiving the data. Although they did share that, more recently, the Illinois State Police (ISP) has been sending prompts when required information is not reported. Departments expressed confusion about what, where, and how to report, and interpretations of the information required to be reported appear to vary across the state. For example, departments either lack clarity or are not aware of the “zero report” requirements, as the low number of zero reports submitted makes it unclear whether incidents went unreported or did not occur.

Since the *Assessment Report*, the ISP Uniform Crime Reporting (I-UCR) program has developed a robust training program, available on the ISP website, to address the challenges departments face in complying with the SAFE-T Act reporting requirements. The program provides one-on-one guidance to departments seeking individualized support and assists with incident-level questions, including reviewing narratives to ensure correct coding. In-person training is also available upon request. Training opportunities are further expanded through monthly, two-day FBI National Incident-Based Reporting System (NIBRS) sessions open to all departments, which the I-UCR program has also hosted at its academy to accommodate departments unable to enroll due to capacity limits. The program leverages ISP Mobile Team Units<sup>5</sup> (MTUs) to support training efforts statewide<sup>(6)</sup> and regularly collaborates with the Law Enforcement Records Managers of Illinois, participating in bimonthly meetings to share information and answer questions. However, awareness of the support available through I-UCR does not appear to be widespread across agencies.

### Questions Regarding Data Utilization and Feedback

Departments expressed uncertainty or a lack of understanding about the value of the data and its use. Departments submit data but indicate they receive little or no feedback on accuracy or completeness, nor do they receive an analysis that indicates the importance of the data. They are unaware of what happens to the data once it is submitted and perceive the reporting requirements as another administrative burden with no purpose.

The I-UCR program maintains that it has a comprehensive quality assurance framework. It conducts regular internal and external audits, including monthly error rate reviews aligned with the FBI’s 4% threshold; works directly with departments and vendors to resolve issues through targeted error

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<sup>5</sup> Mobile Team Units (MTUs) are regional training centers authorized by ILETSB to deliver law enforcement training across the state. MTUs coordinate and provide mandated in-service training, offer specialized courses, and help agencies meet state training requirements by pooling regional resources. They serve as the primary access point for many departments, especially smaller agencies, to obtain required instruction. For more information, visit <https://www.ptb.illinois.gov/training/mobile-team-units-mtus/>.

mitigation training when needed; and sends at least monthly data completeness reports to inform departments of their compliance status.

## REPORTING: IMPLEMENTATION RECOMMENDATIONS

The following recommendations aim to address the implementation challenges and progress summarized above and provide guidance to support consistent statewide implementation of the SAFE-T Act’s reporting requirements.

### Recommendation 1: Verify the Active Agency List

*This recommendation addresses the importance of understanding the state’s overall compliance rate using accurate department information.*

To ensure accuracy in state compliance rates, ILET SB should verify its list of departments to ensure it includes only active departments. It is important that the information ICJIA uses to calculate the state’s overall compliance rate is the most current and does not include any dissolved departments.

### Recommendation 2: Improve the Compliance Rate

*This recommendation addresses improving the compliance rate of agencies that have never reported or reported inconsistently.*

Focusing on agencies that have been noncompliant or inconsistent to ensure they are active, aware of the reporting requirements, and understand their reporting habits can help increase the state’s overall compliance rate and be accomplished in the short term. ICJIA should coordinate with ILET SB to investigate why departments have not reported, or have reported inconsistently, and to develop strategies to improve compliance. Strategies should ensure that leadership, not just the person responsible for submitting the data, receives notification to prevent inconsistent reporting when staff vacancies, turnover, or similar events occur. Relatedly, ICJIA and ILET SB should collaborate with I-UCR to develop IT solutions to address nonreporting and error notifications. Consideration should also be given to including reporting requirements as a topic in ILET SB’s training for law enforcement agency leaders, to researching how other states have improved compliance and reporting quality, and to creating infrastructure so that data can be easily shared among all relevant state agencies.

### Recommendation 3: Clarify Definitions and Create Incentives to Promote Consistent Reporting

*This recommendation addresses improvements in guidance and communication between state agencies and local departments.*

There is a need for ISP and ICJIA to provide centralized oversight; consistent guidance, including clear data definitions; and regular reminders to promote uniform interpretation and data submission across agencies. Additionally, to enhance awareness of reporting requirements, ILETSB should include this information in existing training and state events, develop a basic training on reporting requirements, and use broad email communications to notify departments. Also, ISP should publicly display reporting data, including identifying agencies that are not reporting, on its website to promote accountability.

#### Recommendation 4: Create Regular Reports and Notifications from Submitted Data

*This recommendation addresses the utility of the data at the state and local levels.*

It is important for agencies to recognize that the information they provide is used to promote law enforcement accountability and transparency for Illinois residents, and that it is not an additional administrative burden without purpose. Generating regular reports from agency submissions can also help inform policy and practice, reinforcing the importance of collecting complete and accurate data.

ICJIA and ISP should collaborate and develop a process for producing and sharing regular summary reports using the data that agencies submit. These reports should highlight key findings and illuminate policy implications. Doing so will demonstrate the value of agency contributions and encourage continued submission of complete and accurate data. ICJIA and ISP should consider enhancing public accountability for SAFE-T Act reporting by releasing incident-level data, enabling organizations and individuals to independently verify whether required incidents have been reported. Additionally, ISP and ICJIA should create processes to audit submitted data and notify agencies when data is incomplete.

### USE OF FORCE STANDARDS

The SAFE-T Act established statewide use of force standards to ensure consistent, responsible, and safer policing across Illinois. It defines which types of force are prohibited; restricts some less-lethal methods, especially in crowd-control situations; and mandates that officers intervene, report incidents, and provide medical assistance when force is used.

At a high level, the SAFE-T Act:

- **Prohibits certain uses of force**, such as chokeholds and above-shoulder restraints that could cause asphyxiation, unless lethal force is justified, and bans other practices like using force as punishment or retaliation.
- **Limits specific applications of less-lethal and crowd-control force**, including restrictions on kinetic impact projectiles, prohibitions on indiscriminate crowd dispersals, and requirements for warnings and opportunities to comply prior to the deployment of chemical agents or irritants.
- **Establishes affirmative obligations for officers to provide aid and intervene**, mandating the delivery of medical assistance as soon as reasonably feasible, and to intervene, report, and refrain from retaliation when another officer employs excessive force.

- **Enhances expectations for policy alignment and documentation** by emphasizing that agencies must convert statutory requirements into formal written policies and reinforce them through comprehensive training, internal communications, and after-action documentation.

## USE OF FORCE: IMPLEMENTATION CHALLENGES AND PROGRESS

Law enforcement surveys and stakeholder engagement, combined with an external policy review, during the assessment revealed several ongoing difficulties, especially concerning policy completeness, interpretive clarity, practical verification, and transparency to the public. These challenges, along with some initial steps to address them, are highlighted below.

### Incomplete or Inconsistent Use of Force Written Policies

Although many agencies report updating their use of force policies, the extent of actual implementation varies. The assessment found that, while most agencies reported changing policies, 33% to 50% said they did not include all the SAFE-T Act's specific requirements. The subcommittee's review of 10 Illinois law enforcement agencies' policies shows similar trends: only one agency's policy fully incorporated all aspects of the SAFE-T Act's new standards without altering or excluding any provisions that could change their intent. Several policies lacked key statutory prohibitions, such as specifying that deadly force cannot be used against individuals solely attempting self-harm. Additionally, some policies did not fully reflect the duty-to-intervene requirements, including requirements to intervene, report, and take anti-retaliation measures.

Even after policies are updated, agencies often struggle to understand legislative changes and translate them into clear operational guidance. Law enforcement surveys identified "interpreting changes to use of force policies in SAFE-T Act legislation" as the most challenging use of force implementation activity. This challenge is compounded by agencies' reliance on third-party policy management services (such as Lexipol), which shifts responsibility for policy updates to an outside organization. While law enforcement agencies consider these services indispensable, they can lead to inconsistent interpretations and applications of the requirements.

Since the *Assessment Report*, ILETSB has made significant progress in developing a training portal and resource infrastructure to host training materials, disseminate structured interpretive guidance in plain language, and allow agencies to upload required policy documents. The guidance can serve as a dependable reference for agencies when revising policies, including those managed via third-party systems, and can be updated as questions about implementation arise. The system includes workflow features, such as compliance indicators, aiming to replace ad hoc methods. ILETSB expects to launch this new portal in 2026.

### Verification Capacity and Practical Limits of Centralized Oversight

Stakeholders expressed concerns about effectively verifying statewide compliance. The Use of Force Subcommittee acknowledged that agencies primarily bear responsibility for policy enforcement and that

statewide bodies may not have the capacity to conduct thorough policy audits across more than 800 law enforcement agencies. Consequently, the subcommittee recommended focusing on policy content, adoption, training connections, and basic verification methods achievable with the current authority and resources.

A portal-based workflow, discussed above, can support this intermediary approach by collecting policies, capturing fundamental attestations linked to statutory requirements, and facilitating targeted desk reviews where deficiencies are identified—without necessitating large-scale audits or fostering unrealistic enforcement expectations.

### Need for Transparency and Trust

Community stakeholders regularly underscore the need for transparent, publicly available information on use of force policies, changes under the SAFE-T Act, and how agencies promote officer understanding and accountability.

## USE OF FORCE STANDARDS: IMPLEMENTATION RECOMMENDATIONS

The following recommendations address the implementation challenges outlined above and facilitate uniform statewide adoption of the SAFE-T Act's use of force provisions.<sup>6</sup>

### Recommendation 1: Develop a Statewide Model Use of Force (UOF) Policy

*This recommendation addresses the importance of complete, consistent use of force policies.*

A statewide model use of force (UOF) policy aims to minimize inconsistencies, clarify legislative intent, and supplement existing insurer and consortium templates without replacing them. It offers a uniform foundation that agencies can adopt and customize, helping reduce variability in interpretation, supporting agencies that rely on third-party policy tools, and promoting consistency across jurisdictions of various sizes and capabilities.

ILETSB is advised to convene law enforcement personnel, including the ILACP, along with community/civilian representatives<sup>7</sup> to develop and publish a standardized UOF policy that delineates (a) legally mandated provisions and (b) optional best practice guidance and implementation tools that agencies may adopt in accordance with their capacity. The policy should explicitly identify statutory requirements, such as bans on chokeholds and above-shoulder restraints unless lethal force is justified; restrictions on certain less-lethal projectiles and tactics; and responsibilities to intervene, report incidents,

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<sup>6</sup> Some Workgroup members representing the ILACP opposed all the use of force recommendations for the stated reason that the committee did not address a core concern of law enforcement: making legislative changes to allow less-lethal options into statute, with the aim of expanding available response options and potentially reducing reliance on deadly force. However, legislative changes such as these were outside the charge of the Workgroup, which focused instead on how to implement the existing statute.

<sup>7</sup> A Workgroup representative of the ILACP opposed including community members without relevant subject-matter expertise in police use of force.

and provide aid. The best practice guidance could offer practical tools that assist agencies in training and integrating the policy into daily operations, including shared definitions, guidance on de-escalation and proportionality, sample report language, roll-call scripts, scenario cues, and after-action checklists.

### Recommendation 2: Enhance the ILETSB Portal for Voluntary Policy Upload and Statutory Attestation

*This recommendation provides guidance to agencies on interpreting changes to use of force policies.*

By integrating three new functions, ILETSB’s training portal can serve as a practical bridge between policy and training. First, the portal would provide access to the statewide model UOF policy and related guidance, making them easy to find, download, and adopt. Second, it would encourage voluntary uploads of local agency UOF policies and, where feasible, related directives such as reporting, notification, supervision, and post-incident procedures that agencies use to implement UOF requirements. Third, it would feature a simple, standardized attestation tool enabling agencies to track statutory “must-haves.” This tool would be intuitive, allowing agencies to indicate whether their policies address each statutory element by noting the relevant section, page, or a short heading. These new functions would allow agencies to quickly show how statutory requirements are addressed in writing, officers and supervisors to reliably locate current policy and related training resources, and ILETSB to better understand where the field needs guidance—without creating a burdensome audit system or expanding enforcement expectations beyond what is feasible.

The goal is to maintain statewide clarity regarding policy requirements and not to evaluate policy quality or legal validity, or to serve as a formal compliance or audit system. This is particularly important for smaller, rural, and resource-limited agencies that often face challenges like limited administrative staff, fewer legal access points, and reduced training resources.<sup>8</sup>

### Recommendation 3: Publish Plain Language Policy Updates and Seek Community Input Where Feasible

*This recommendation aims to foster community transparency and trust.*

To enhance transparency and foster trust, local law enforcement agencies should promote straightforward, plain-language communication with the public and, whenever possible, collaborate with their communities on updates to UOF policies while ensuring that recommendations do not impose requirements beyond what the SAFE-T Act framework can practically accommodate.<sup>9</sup> Community input

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<sup>8</sup> A Workgroup representative of the Illinois Sheriffs’ Association did not support this recommendation, noting that third-party policy management services already provide this type of support. The recommendation, however, is aimed primarily at smaller departments that may not have access to such services.

<sup>9</sup> A Workgroup representative of the Illinois Sheriffs’ Association opposed this recommendation as unnecessary. No further explanation was provided.

may be particularly valuable when agencies adopt policies that go beyond statutory requirements, as well as in shaping how policies are interpreted, implemented, and reinforced through training, especially in situations involving populations disproportionately impacted by the use of force (e.g., individuals with behavioral health needs).

Local departments should also provide an easily shareable, one-page summary titled “Our Use of Force Policy at a Glance.” This summary should clearly explain, in simple terms: (1) legal requirements, (2) any agency-specific additions or clarifications, (3) officers' responsibilities after force is used, and (4) where the public can find more information. Over time, this approach should encourage more agencies to publish updates promptly and help shift public questions from “What is the rule?” to “How is it applied here?”

To promote uniform public messaging across the state around UOF policy updates, ILETSB should develop and distribute a communications toolkit comprising a template for the one-page summary, a brief FAQ, and a glossary. The kit should feature label conventions (such as “required by law” versus “agency choice”), illustrative examples explaining “what changed and why,” and instructions on accessibility and translation.

## BODY-WORN CAMERAS

Passed in 2016, the Law Enforcement Officer-Worn Body Camera Act established statewide standards for the use of body-worn cameras (BWCs) and their technological capabilities.<sup>10</sup> The SAFE-T Act incorporated those standards and mandated their use statewide on a rolling basis.

At a high level, the SAFE-T Act:

- **Required all Illinois law enforcement agencies** to implement BWC use for all their officers by January 1, 2025.
- **Gave ILETSB the responsibility of overseeing and managing grant award funding** for BWC implementation.
- **Empowered ILETSB to create uniform statewide standards** for BWC use.
- **Placed restrictions** on when and how BWC footage may be used.

### BODY-WORN CAMERAS: IMPLEMENTATION CHALLENGES AND PROGRESS

Law enforcement surveys and listening sessions, along with community input, during the assessment process highlighted several ongoing challenges related to implementing the SAFE-T Act’s BWC mandates, particularly in responding to Freedom of Information (FOIA) requests, accessing camera grants, and

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<sup>10</sup> 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>.

ensuring transparency in their use. These challenges, along with some initial steps to address them, are highlighted below.

### Concerns About Responding to Freedom of Information Act (FOIA) Requests

Law enforcement surveys revealed that fulfilling FOIA request requirements was rated as the most challenging aspect of BWC implementation. That sentiment was repeated by law enforcement participants in earlier listening sessions and by the BWC Subcommittee, who stated that FOIA requests for BWC footage require significant time and resources for redaction. According to subcommittee members, an hour of BWC footage typically takes two hours to redact and prepare for release. While AI redaction technology is an emerging tool, it is not yet reliable enough to eliminate the human touch. Also, FOIA requests are usually received for incidents involving multiple officers, which adds to the already lengthy time it takes to review and redact footage. In addition, in general, FOIA requests for BWC footage must be fulfilled within seven days, the same time as requests for other public paper or electronic records—even though BWC footage takes much longer to prepare. Some agencies appear unaware of the time frame extensions that apply to certain FOIA requests.

Agencies with the resources have created dedicated FOIA teams or staff to handle the volume of requests. In addition, the Office of the Public Access Counselor (OPAC) within the Office of the Illinois Attorney General offers advice and education regarding FOIA requests to public agencies.<sup>11</sup> OPAC provides the required annual online training for FOIA officers of public agencies, along with in-person training and four annual webinars on handling FOIA requests for video recordings. The OPAC website also includes resources to assist FOIA officers in responding to FOIA requests, and OPAC operates a hotline and responds to informal inquiries.

In addition to concerns about the time required to fulfill FOA requests, agencies are sensitive to the need to comply with legal requirements, particularly the requirement to release BWC footage of an adult arrest, irrespective of the requester's identity or the purpose of the request, including commercial purposes. This includes fulfilling requests from parties with no affiliation to the case, who then post the footage on social media for entertainment and financial gain. Subcommittee members indicated that, at times, the footage released to these parties does not capture police misconduct; instead, it is posted to highlight the unflattering behavior of those arrested. This results in harm to those depicted in the footage who may never be convicted but who are left to deal with the humiliation of their arrests being indefinitely available online.<sup>12</sup>

The subcommittee spent significant time considering third-party FOIA requests for BWC footage and heard from various stakeholders on their positions regarding addressing the unanticipated consequences

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<sup>11</sup> For more information about the Public Access Counselor, see <https://illinoisattorneygeneral.gov/open-and-honest-government/pac/>.

<sup>12</sup> The use of BWC footage for entertainment purposes was highlighted in an episode of Last Week Tonight with John Oliver and is illustrative of the issue discussed: [https://www.youtube.com/watch?v=jP4\\_2soVZe0](https://www.youtube.com/watch?v=jP4_2soVZe0).

for both law enforcement departments and the subjects of the footage. The Illinois Association of Chiefs of Police (ILACP) shared that it is pursuing legislative action to redefine what constitutes a legitimate FOIA request so that departments can deny requests from individuals whose motivation is personal financial gain. Specifically, they seek to limit the release of BWC footage to the subject of the encounter, their representative, those with standing in the matter, or those with the subject's permission. The ILACP agrees that police actions, especially when improper, should be accessible to the public, but they state that, more often, releasing BWC footage to third-party requesters denigrates the subject without highlighting any police misconduct. The ILACP indicated an intention to collect data on BWC footage requests to support its position, but, to date, no data has been shared.

Several subcommittee members representing advocacy organizations (e.g., American Civil Liberties Union of Illinois, Better Government Association, Impact for Equity) opposed legislative changes to FOIA, arguing that they were necessary to ensure police accountability, as intended by the SAFE-T Act. They argued that the FOIA statute contains sufficient options to address departmental burdens in filling requests and that defining a suitable versus unsuitable requester or a legitimate versus illegitimate news source is impossible. It is their position that the law must allow anyone to request public records. They emphasized that it is essential that footage of police performing their duties, particularly arrests, be made available to the public, and that the ability to access that information outweighs the unfortunate situation in which someone's arrest is posted online. They also pointed out that the law allows law enforcement to turn off their cameras in certain situations, which protects individuals who have a reasonable expectation of privacy. Furthermore, they believe that more quantitative data on the number of requests received by agencies, the time and process required to fulfill requests, and law enforcement's capacity to fulfill them, as well as an increased understanding of the consequences of releasing BWC footage, are needed before legislative changes are considered.

### Requirements Related to Accessing ILETSA Camera Grants

The low output of the \$33 million in camera grant funding administered by ILETSA was highlighted in the *Assessment Report*. Law enforcement representatives on the subcommittee indicated that the application, contractual, and reporting requirements for the grants may be viewed as overly burdensome and may discourage some departments from pursuing funding. Also cited were restrictions on allowable expenses, including leases, repairs, data storage, and bundles, and that the increasing costs of these items are not taken into account when grant awards are made. In addition, grant funds were distributed through a reimbursement process rather than advanced funding, which may have precluded departments that lacked resources for upfront costs from pursuing the grants.

Since the publication of the *Assessment Report*, ILETSA has indicated that grant applications have increased and, in FY25, ILETSA's camera grants began allowing the purchase and leasing of cameras, as

well as data storage.<sup>13</sup> Many departments are bundling equipment and moving toward unlimited storage. In addition, after receiving an initial grant award, departments can apply for extra funds to cover increasing data storage costs. Advance payments were also implemented and are intended to replace reimbursement payments in future grant cycles. And rolling awards have been adopted to allow greater flexibility in the application process.

While the number of BWC grant applications has increased, the changes to BWC grant funding to better meet agency needs do not appear to be widely known. Some departments may continue not to pursue BWC grant funding due to an outdated understanding of grant requirements and the costs they cover.

### Limited Community Education and Engagement

Community listening session participants valued body-worn cameras for enhancing officer accountability and deterring misconduct, but they raised concerns about the overall lack of transparency in their use. The subcommittee discussed the need for better education on BWC policies (how and when they record), the FOIA process, and privacy considerations. Some departments have created web pages dedicated to BWC information to raise awareness of both BWC functions and limitations.

## BODY-WORN CAMERAS: IMPLEMENTATION RECOMMENDATIONS

The recommendations that follow are designed to build on the progress already made in the areas described above, provide guidance to support consistent statewide implementation of the SAFE-T Act's BWC requirements, and address areas where consensus is lacking.

### Recommendation 1: Promote Access to FOIA Training and Guidance on BWC Requests

*This recommendation addresses challenges associated with FOIA requests for BWC footage.*

As previously indicated, OPAC provides online and in-person training and written guidance, including on how FOIA applies to BWC footage, to FOIA officers of public agencies. However, the visibility of and access to these resources can be improved so that accurate and current information about statutory requirements and best practices filters down to department staff beyond FOIA officers and records staff, including supervisors and front-line personnel. Expanding and encouraging access to FOIA resources may also help raise awareness of the options available to extend timeframes and shift some cost burdens to certain requesters.

In addition, OPAC, in partnership with ILETSB, the Illinois Sheriffs' Association, and ILACP, should continue and expand training and guidance on BWC FOIA requests. Identifying educational and training needs relative to FOIA, along with additional opportunities to deliver training, such as routine meetings

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<sup>13</sup> Historically, intangibles were not allowable costs under these grants. Equipment funds were to be used for items that could be seized or returned in the event of default. This is why the costs of maintenance, repair, and data were not covered. However, rules governing the grants are beginning to change, and back-end protections, such as insurance, have been put in place.

and association events, should be considered. Existing and future OPAC resources should be actively promoted to member agencies and made easily accessible.

The subcommittee did not reach consensus on a recommendation to address uninvolved third-party FOIA requests for BWC footage, and members were divided on whether a legislative approach is warranted. The subcommittee discussed a potential analysis of these requests to better inform any future response. BWC FOIA requests have created unexpected procedural, operational, and financial challenges, and additional data and analysis are needed to fully understand their scope and identify ways to reduce their impact. Depending on the findings, solutions could include increased funding to support FOIA administration or shifting some of the regulatory burden to the requestors seeking to release BWC footage publicly. Obtaining data for such an analysis is currently not feasible, as law enforcement associations have shifted their efforts to legislative pursuits rather than data collection.

### Recommendation 2: Widely Distribute ILETSB Grant Information

*This recommendation addresses the output of BWC grant funding.*

Enhancing awareness of current funding opportunities may encourage additional BWC grant applications. After the BWC subcommittee completed its work and made this recommendation (in September 2025), ILETSB made its grant information more accessible and visible to law enforcement departments. ILETSB now prominently posts grants opportunities on its websites as well as statutorily required websites. Other ways to publicize these opportunities include distributing regular updates via email or newsletters, and offering webinars or workshops to help agencies identify and apply for funding. Partnering with law enforcement associations to use their platforms, regular communications, meetings, and conferences to distribute grant information can help raise awareness and stimulate interest. ILETSB reports that since they improved the dissemination of grant information and after some statutory changes, there was an increase of almost 100 times the amount requested compared to Fiscal Year 2025.

### Recommendation 3: Create a Template BWC Webpage for Law Enforcement Agencies

*This recommendation aims to increase public understanding of BWC use.*

To help foster community education on the use of BWCs, ILETSB should create a template webpage for law enforcement agencies that clearly explains their use and limitations, and includes common questions and answers, particularly those that address public concerns.<sup>14</sup> The template should be widely shared and should include guidance on customizing for local context.

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<sup>14</sup> A representative from the Illinois Sheriffs' Association opposed this recommendation, stating that it is unnecessary because body-worn camera use is already clearly outlined in statute.

## TRAINING PRACTICES

The SAFE-T Act introduced a comprehensive set of updates to Illinois’ law enforcement training practices. These changes align Illinois more closely with national best practices and emphasize skills that promote safe, fair, and community-focused policing. Overall, the Act improves Illinois’ law enforcement training standards by broadening core competencies, encouraging consistent statewide practices, and supporting more effective and accountable policing.

At a high level, the SAFE-T Act:

- **Added new requirements for basic training**, ensuring recruits receive foundational training in crisis intervention, de-escalation, high-risk traffic stops, and other safety-critical topics.
- **Expanded in-service training requirements**, including new minimum hours and additional subject areas related to de-escalation, officer safety, and constitutional policing.
- **Increased the use of hands-on, scenario-based training** to reinforce practical decision-making and reduce reliance on lecture-only formats.
- **Directed ILETSB to develop specialized curricula**, most notably a 40-hour Crisis Intervention Team (CIT)<sup>15</sup> program created in collaboration with mental health professionals, families, and consumer advocates.
- **Established training requirements for agencies operating state-funded deflection programs**, with a focus on addiction science, stigma reduction, racial and gender equity, and effective community partnerships.

### TRAINING PRACTICES: IMPLEMENTATION CHALLENGES AND PROGRESS

Law enforcement surveys and listening sessions, along with community input, during the assessment process highlighted several ongoing challenges in meeting the SAFE-T Act’s training requirements, particularly related to training availability, compliance demands, and community expectations for preparedness and transparency. These challenges, along with some initial steps to address them, are highlighted below.

#### Limited Availability of Required Training

Many law enforcement agencies noted that accessing the hands-on, scenario-based training required under the SAFE-T Act can be challenging. Courses offered by MTUs often reach capacity quickly, and approved lesson plans are not always widely shared, which can limit agencies’ ability to train officers on required content (and can contribute to inconsistent delivery of the same courses across agencies). Officers also reported that training on high-liability topics, such as officer safety, high-risk traffic stops, and use of force and de-escalation, is not always readily available when needed. That said, because of concerns expressed through the Workgroup’s assessment and recommendation process, additional

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<sup>15</sup> Crisis Intervention Team (CIT) training is a 40-hour program that equips officers to respond safely and effectively to individuals experiencing mental health or behavioral crises, aiming to reduce the use of force and improve community trust. For more information, visit <https://www.ptb.illinois.gov/training/crisis-intervention-team-cit/>.

training courses were added; ILETSB reports that as a result, over 98 percent of officers required to complete training verifications this year are fully compliant with all training mandates.

In addition, while existing classroom training offers both knowledge- and skill-based instruction, it is less accessible than online options and, as discussed, can place additional strain on staffing and daily operations when officers are reassigned for in-person sessions. Current online courses effectively share information but rely largely on passive learning, while virtual reality offers valuable hands-on practice but is available at only a limited number of locations statewide.

ILETSB is taking several steps to improve access to (and consistency in) mandated training content statewide. These include developing standardized syllabi and lesson plans for all mandated training, beginning with high-liability topics. ILETSB also plans to launch an online instructor directory where agencies can view approved instructors, making it easier to secure the instruction they need, and where instructors can access their approval letters and expiration dates. In addition, instructors trained through private organizations in high-liability, advanced, or specialized operational skills—such as tactical decision-making, advanced firearms, or officer safety techniques—will be required to teach that organization’s official curriculum. ILETSB is also drafting formal processes to support instructor training.

### Training Compliance and Operational Strain

Many agencies, notably smaller departments, described challenges in meeting mandated training requirements while maintaining daily operations. When officers are reassigned to attend training, agencies often incur overtime costs or reduced staffing, which can strain already limited resources. Some agencies also noted that navigating existing electronic systems to identify required courses and track officer compliance with mandated training can be onerous.

To help reduce administrative burdens and support compliance, ILETSB is expanding the online course catalog to include certified course names, hours, applicable mandates, and instructor requirements, with quarterly updates as new courses are approved. In addition, the online system for tracking officer compliance with mandated training is being upgraded to provide clearer information on officer training records, hours, and expiration dates, with features that allow users to view more detailed information for each mandate and to verify compliance.

### Community Expectations for Preparedness and Transparency

Community members noted that it is often difficult to understand what officers are being trained on and how agencies are progressing toward statewide training standards. They also shared that current training requirements may not always align with the realities officers encounter in the field, particularly in situations involving individuals in crisis. Participants expressed interest in expanded scenario-based training, stronger cultural competence training, and greater involvement of survivors, advocacy groups, and community partners in shaping training content. They also noted that public access to training materials or curriculum summaries, along with clearer indicators of agency compliance, would help build transparency and trust.

ILETSSB’s development of standardized syllabi and lesson plans can, over time, support broader public understanding of training content by making communications about what officers are being taught more consistent and transparent.

## TRAINING PRACTICES: IMPLEMENTATION RECOMMENDATIONS

The following recommendations aim to address the implementation challenges and progress summarized above and provide guidance to support consistent statewide implementation of the SAFE-T Act’s police training requirements.

### Recommendation 1: Adopt Interactive Learning Tools

*This recommendation addresses ongoing challenges in training availability, officer compliance with mandated requirements, and community expectations for officer preparedness in crisis situations.*

Expanding ILETSSB’s training model to include interactive online learning tools—alongside existing classroom, online, and virtual reality offerings—would improve access to mandated training, support officer compliance, and better align training with community expectations for effective crisis response.<sup>16</sup> Interactive online learning tools may include branching scenarios that prompt decision-making with immediate feedback, video simulations that pause at key moments for officer assessment, virtual role-play exercises that allow practice in communication and de-escalation, guided case studies built around real or realistic incidents, and moderated discussion boards that support peer learning and reflection.

Interactive tools should be integrated into existing learning platforms in a way that is compatible with MTU and academy systems and accessible to officers on their own time. Establishing clear quality standards (e.g., benchmarks for realism, scenario design, feedback accuracy, and alignment with learning objectives) will help ensure consistent learning across mandated topics. Early pilot testing can also identify any technical or usability issues before broader rollout. Additionally, any new tools should align with current syllabi, lesson plans, and virtual reality content to support a cohesive statewide training model—one that avoids unnecessary duplication or burdens for agencies.

### Recommendation 2: Conduct a Comprehensive Cost and Funding Analysis

*This recommendation addresses ongoing challenges in meeting mandated training requirements while maintaining daily operations, particularly given funding restrictions.*

ILETSSB should work with ICJIA or the Governor’s Office of Management and Budget (GOMB) to conduct a comprehensive, statewide analysis of training costs and available funding. This analysis would clarify the full scope of expenses associated with ensuring officer compliance with mandated requirements and help

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<sup>16</sup> A Workgroup representative of the Illinois Sheriffs’ Association opposed this recommendation, citing existing challenges in meeting new training requirements and noting that it could raise training demands and related costs.

determine whether agencies have sufficient resources to meet both training obligations and core operational needs.

ILETSA currently produces a quarterly report that tracks training costs by MTU region. However, these calculations rely on an outdated officer's hourly rate and capture only the direct costs associated with delivering and completing mandated courses. The report's regional structure also limits its usefulness, as each region comprises a mix of urban, suburban, and rural agencies with significantly different staffing models, training needs, and resource constraints. As a result, the current reporting does not capture meaningful variation across agencies or reflect the full range of expenses incurred in meeting training requirements.

A comprehensive understanding of statewide training costs and the funding available to support them is essential for determining where agencies face disproportionate burdens and where additional resources, efficiencies, or policy adjustments may be needed. The analysis should identify the full range of cost pressures and highlight opportunities to streamline training delivery or reduce unnecessary expenses.

The analysis should examine direct and indirect expenses associated with both mandated and nonmandated training and professional development. This may include (but is not limited to) the staff time required to coordinate attendance for and participate in training or conferences; the overtime or backfill needed to maintain operational coverage; and any travel, lodging, equipment, or materials necessary to support participation. It may also consider the costs of compensating instructors, securing training facilities, managing administrative and data entry tasks, developing or updating courses, purchasing consumables such as training ammunition, and addressing related liability and insurance needs.

The analysis should also review current funding streams, such as MTU reimbursements, ILETSA grant programs, agency training budgets, and other state or federal sources, to determine whether existing funding is sufficient, sustainable, and equitably distributed across agencies of different sizes and regions.

Based on these findings, the assessment should recommend practical strategies to improve the efficiency, sustainability, and affordability of training across the state. Possible approaches include quarterly MTU rotations to expand access to high-demand courses, MTUs delivering training directly to smaller agencies to reduce travel and staffing impacts, micro-grants for officers who must travel long distances, adjustments to funding formulas or reimbursement mechanisms, eliminating nonmandated courses that lack officer or community support, mini-grants to offset disproportionate training costs for small agencies, or cooperative funding models in which larger and smaller agencies pool resources to ensure equitable coverage of training expenses.

### **Recommendation 3: Create a Public Dashboard to Share Aggregated Training Data**

*This recommendation responds to community feedback emphasizing the need for greater transparency to strengthen public trust.*

ILETSSB’s annual training report provides important insights into statewide training activity; however, it is only available in PDF format, limiting the ability to extract, analyze, or compare information. As a result, there is limited visibility into statewide training patterns and agency-level compliance with mandated requirements. ILETSSB should develop a publicly accessible online dashboard to address these limitations by presenting training data in a more usable format for viewing, interpreting, and downloading.<sup>17</sup> The dashboard would display aggregated data rather than disclosing information about individual officers and would highlight public-interest information, such as the number and percentage of officers statewide and within each agency who have met statutory training requirements. Collecting data at the agency, regional, and statewide levels would provide meaningful insights across contexts.

The dashboard should use plain language, intuitive navigation, and clear visualizations, with brief explanations of key terms, training mandates, and data sources to support accurate interpretation. High-level indicators, such as overall compliance rates or total course completions, would give users a clear snapshot of progress at each level. To maximize usability, the dashboard should allow users to filter and download data in multiple formats, incorporate standard accessibility features, and function effectively on mobile devices. Finally, the dashboard should auto-update or be refreshed regularly (e.g., quarterly) to ensure the information remains accurate and reflects ongoing progress toward training compliance.

#### **Recommendation 4: Develop Clear, Standardized Descriptions for All Mandated Training Courses**

*This recommendation responds to community feedback emphasizing the need for greater transparency to strengthen public trust.*

ILETSSB should provide short, clear, and standardized descriptions of mandated training courses, which would increase community members’ understanding of the content of training requirements, allow them to compare courses across topics, and help clarify how statewide training supports both public safety and community priorities.

In developing and maintaining these descriptions, plain, accessible language should be used, and each description should follow a consistent structure that includes the course’s name, purpose, learning objectives, core topics, delivery method (e.g., classroom, scenario-based, online), and applicable mandates. The descriptions should be reviewed and updated regularly, especially as ILETSSB finalizes standardized syllabi and lesson plans, to ensure they remain aligned with current training standards. Descriptions should also include brief explanations of key terms and concepts to support public understanding and be available via multiple accessible platforms, such as the training data dashboard (Training Recommendation 3) and the ILETSSB website.

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<sup>17</sup> A Workgroup representative of the Illinois Sheriffs’ Association opposed this recommendation, noting that ILETSSB already faces significant implementation demands.

## Recommendation 5: Develop Statewide Guidance for Incorporating Community Perspectives into Training

*This recommendation addresses community concerns about ensuring officers are trained to respond effectively in crisis situations, a key factor in strengthening public trust.*

Community members highlighted that individuals with lived experience—such as survivors of police violence, behavioral health professionals, advocates, and families—can offer perspectives that help ensure training reflects the real-world situations that officers encounter. Clear guidance on integrating community voices into training development and delivery would help strengthen the relevance of training, support officer preparedness, and reinforce community trust.

The Monitoring Workgroup (to be convened by the Governor’s Office; see “Ongoing Implementation Oversight and Coordination” below) should establish a subcommittee to define meaningful community involvement in police training. The subcommittee should include community members, law enforcement leaders, advocacy organizations, and training professionals, and be responsible for developing clear guidance on how community perspectives can inform the development and delivery of law enforcement training curricula. This guidance could include core principles (e.g., community members with diverse backgrounds and firsthand experience are recognized and engaged as equal partners in shaping training content), as well as a structured framework that outlines the goals of community involvement, criteria for selecting community participants,<sup>18</sup> expectations for how input will be gathered and incorporated, and processes for ongoing communication and feedback.

### DISCRETIONARY DECERTIFICATION

The SAFE-T Act established a strengthened statewide police officer certification and decertification framework intended to promote accountability, public trust, and consistency across agencies while preserving due process protections for officers.

At a high level, the discretionary decertification components of the SAFE-T Act establish a **formal process for handling serious misconduct that may not automatically lead to decertification** but that still raises concerns about an officer’s fitness to serve. This process is based on evidence and follows a fair procedure, usually progressing through stages including (1) complaint or notice intake and jurisdictional screening, (2) an investigation and evidentiary review, (3) charging decisions when relevant, (4) an evidentiary hearing before an Administrative Law Judge (ALJ), (5) a review by the Certification Review Panel, and (6) a formal decision by the Board. Subsequent appeal options include initially appealing to the Board and, if the decertification is upheld, seeking judicial review.

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<sup>18</sup> A representative of the ILACP raised concerns about this recommendation, emphasizing that training criteria should be developed by individuals with law enforcement expertise or relevant professional backgrounds (e.g., psychologists, counselors, sociologists) rather than by individuals without subject-matter expertise.

## DISCRETIONARY DECERTIFICATION: IMPLEMENTATION CHALLENGES AND PROGRESS

Law enforcement surveys and listening sessions, along with community input gathered during the assessment process, raised initial concerns about whether discretionary decertification would be carried out in a timely, understandable, and transparent manner. The Discretionary Decertification Subcommittee reaffirmed these themes, emphasizing that successful statewide implementation depends on two key factors: (1) a clear workflow that guides matters from intake through hearing and decision within a predictable timeline, and (2) transparent, consistent communication about the process, including the information shared at each stage and the rights and expectations of officers, agencies, and the public. These themes, along with the steps taken to address them thus far, are highlighted below.

### Delays and Limited Throughput in Advancing Matters to Formal Charges and Hearings

The initial implementation has progressed more slowly than many stakeholders anticipated. Subcommittee members were uncertain about the timeline for discretionary matters to advance to formal charges and hearings. This underscored the need for predictable timelines to help agencies, officers, and the public understand what constitutes “progress” in a new statewide system. Additionally, members considered the practical reality that ILETSB may receive a substantial volume of misconduct notices, though only a subset may be complete, jurisdictionally appropriate, and sufficiently substantiated to warrant investigation and charging decisions.

ILETSB has made notable progress in building the core infrastructure to ensure compliance with all aspects of the SAFE-T Act’s discretionary decertification provisions. The Board adopted 13 pages of administrative rules that govern administrative hearings and establish a consistent framework for ALJ proceedings and reviews. Important legal staffing, including Certification Counsel roles, has been put in place; six ALJs have been retained as of the date of this report; and hearing facilities have been set up. A secure hearing portal was launched in which parties and the administrative law judges can file documents and receive automated notifications relating to cases. The Certification Review Panel has scheduled meetings and started organizing procedures for service and case scheduling. Trainings were developed for and completed by the Panel members and the ALJs.

Significant progress has also been made with individual cases: formal complaints have been successfully filed in the hearing portal and served on officers; officers and/or their attorneys have successfully accessed the hearing portal and filed their own responsive pleadings and requests for hearings; complaints and requests for hearings have been presented to and assigned by the Panel to ALJs for further scheduling; prehearing conferences have either been held or are presently scheduled; dispositive motions have been filed and ruled on with recommendations sent to the Panel for approval; hearings have been scheduled for discretionary decertification; and the Panel continues to meet on a regular basis to assign complaints and requests for hearings and to review orders and recommendations from ALJs.

## **Inconsistent Submission Requirements and Ambiguous Evidentiary Standards During Intake**

Members of the subcommittee noted that law enforcement agencies vary widely in how they submit misconduct notices, both in content and format. These inconsistencies can complicate triage, result in repeated follow-up requests for missing details, and create different expectations across jurisdictions. They also recognized the difficulties of managing anonymous complaints, which can hinder follow-up, evidence gathering, and verification. Nonetheless, they stressed the need to require specific, verifiable details; use neutral screening criteria; and establish clear tracking processes to prevent misuse and avoid delays.

ILETSB counsel outlined intake procedures to address these challenges, including an initial jurisdictional review and a preliminary evaluation to determine whether a case is sufficiently clear and well-supported to proceed with an investigation. Subcommittee members repeatedly emphasized the need for standard forms and a common definition of “completeness” to ensure more consistent intake decisions and to streamline the process statewide, particularly for smaller agencies with limited administrative resources.

## **Gaps in Public Understanding and Transparency, Including Hearing and Record Access**

Community participants and subcommittee members noted that public awareness of discretionary decertification remains limited. They pointed out that many are unclear about when a matter enters the formal process and what information is accessible at different stages. Additionally, participants expressed concerns about the effectiveness of current public tools, emphasizing the need for plain-language definitions, ADA-compliant design, and straightforward explanations to avoid misinterpretation.

Subcommittee discussions highlighted the importance of distinguishing between (1) hearing access and (2) access to case materials. While hearings are open to the public, case files and records are protected by due process and confidentiality laws, making them unavailable before a hearing. Typically, public access is granted after a case is closed. This crucial difference supports transparency initiatives that keep the public informed without undermining officers' rights or the integrity of proceedings.

## **Gaps in Officer-Facing Information About the Process**

Subcommittee members emphasized that officers need clear, timely, and straightforward information regarding what happens after a complete notice is logged. This should include details about the different stages, rights, and timelines, as well as a dependable contact. Without standardized materials or clear triggers to share them, officers may rely on informal sources, receive inconsistent messages, or encounter incomplete data. These gaps can result in confusion, reduce perceptions of fairness, and create unnecessary friction, even if cases do not progress beyond initial intake or investigation.

ILETSB's investments in rules, staffing, facilities, and portals create an opportunity to combine operational improvements with standardized, officer-facing information. This ensures that due process is integrated into the workflow and remains clear to those directly affected.

## DISCRETIONARY DECERTIFICATION: IMPLEMENTATION RECOMMENDATIONS

The following recommendations target the discretionary decertification challenges described above and emphasize practical steps to improve consistency, fairness, and transparency in implementation, while safeguarding due process. These suggestions are designed to be feasible for agencies of various sizes and capabilities, aiming to reduce unnecessary delays and confusion.

### Recommendation 1: Standardize the Intake Process and Provide Officers with Timely Information

*This recommendation addresses the need for consistent, timely submission processes and improved officer communications.*

ILETSB can make the decertification intake process smoother and clearer for everyone by providing a simple statewide intake packet that would help reduce unnecessary delays and speed triage, especially for smaller agencies. It would also promote consistent expectations across the state about what a complete submission looks like. At a minimum, the intake packet should include: (1) a short Notice of Misconduct form, (2) a one-page triage checklist to confirm everything is in order, and (3) a routing and status cover to help track progress and ensure smooth handoffs. The drafting process should aim for forms that are short, consistent, and operationally realistic, with clear instructions that reduce incomplete submissions while avoiding overly legalistic or adversarial language.

At the same time, when a complete notice is submitted, officers should receive clear, straightforward handouts that walk through each step of the process—from intake to any hearings and Board actions. ILETSB reports that staff attorneys developed a “know your rights” form for officers facing decertification and refusals of reactivation, and responsive template forms for answers and requests for hearings. Ideally, these materials will also explain typical timelines and include a single point of contact for convenience. It is best if these materials are available on a mobile-friendly, read-only webpage, offered in commonly used languages and in accessible formats, so everyone can easily retrieve and understand them. Counsel should review all content to make sure it remains neutral and respects confidentiality and discovery rules. ILETSB would keep the templates and web content up to date, while employing agencies should make sure notices are served on time. If an officer is no longer employed, ILETSB should handle the service.

### Recommendation 2: Develop a Public Decertification Dashboard, Improve the Officer Lookup Tool, and Provide Regular Briefings

*This recommendation addresses the community’s desire for increased awareness of the discretionary decertification process.*

To promote greater transparency, ILETSB could consider creating a straightforward, rights-respecting information package that consists of (1) a user-friendly public dashboard with plain-language explanations,

showing key information like notices, charges, hearings, decisions, and timeliness, including median days between milestones and case statuses; (2) improving the existing officer lookup tool so it is easy to use and mobile-friendly to share information allowed by law; and (3) short, quarterly updates or a one-page summary to share progress and highlight trends.

It is important that the new lookup tool aligns with the dashboard’s definitions to ensure consistency in terms and stages across all public tools, reducing user confusion and building greater trust. It is also important that guardrails are clear and consistently followed. For example, dashboard data should be aggregated with staged disclosures, and officer-lookup content should include only what the statute permits. While hearing proceedings are open to the public, case materials must adhere to due process rules and are not available before a hearing. This crucial difference supports transparency initiatives that keep the public informed without undermining officers’ rights or the integrity of proceedings. These guidelines should be communicated in plain language, so everyone understands what information is and is not shared and the reasons behind these decisions.

### Recommendation 3: Coordinate with the Attorney General’s Office on Legislative Cleanup Efforts

*This recommendation addresses the need to stay current on legislative updates.*

The Monitoring Workgroup (to be convened by the Governor’s Office; see “Ongoing Implementation Oversight and Coordination” below) should coordinate with ongoing legislative and rule “cleanup” efforts in a neutral, light-touch role. This function should maintain a watch list of active proposals; prepare briefings on operational impacts, such as workflow, officer communications, and transparency products; and engage with proponents, including the Attorney General’s Office (AGO), to clarify intent and timing.

This method ensures the monitoring entity remains centered on implementation, while enabling targeted enhancements that improve speed, clarity, and manageability, such as defining decision-making authority, standardizing data and reporting standards, and minimizing ambiguity that can hinder intake, charging decisions, or transparency efforts.

## Foundations for Continued Implementation

Implementation science examines the organizational, operational, and contextual factors that shape whether a reform is delivered as intended and produces meaningful results in practice. At its core are principles that emphasize **co-creation and engagement**—building shared understanding and partnerships across stakeholders through co-learning, co-design, and active brokering of relationships; **continuous improvement**—assessing needs and context, applying implementation frameworks and strategies, and using data and feedback loops to monitor progress and refine approaches; and **sustaining change**—growing relationships, building capacity, cultivating leadership and champions, and facilitating

ongoing adaptation so that practices remain effective over time and responsive to changing conditions.<sup>19</sup> This report draws on these principles to identify foundational elements that support consistency, coordination, and long-term sustainability in the statewide implementation of the SAFE-T Act.

The discussion below does not introduce additional recommendations. Rather, it highlights foundational conditions that reinforce alignment, accountability, and adaptability as implementation continues.

## **STATE-LEVEL COMMUNICATION AND COORDINATION**

Successful implementation requires clear communication and structured coordination among the entities responsible for implementing legislative changes. While communication ensures that information about statutory requirements, timelines, and expectations reaches agencies statewide, coordination shapes how those requirements are interpreted, aligned, and operationalized across organizations.

Key law enforcement agencies and associations, including ILETSB, ILACP, and the Illinois Sheriffs' Association, maintain established communication channels with their members and constituencies. The ways in which these agencies disseminate information, align guidance, clarify expectations, and sequence implementation efforts influence how consistently the legislation is understood and applied across jurisdictions.

Consistency across jurisdictions is strengthened when organizations coordinate their approach to standards, resource development, policy interpretation, and implementation timelines. Ongoing coordination, whether formal or informal, helps build shared understanding, avoid duplication, and promote more consistent application of the Act's provisions statewide.

## **STATE–LOCAL FEEDBACK LOOPS**

Beyond communication and coordination among statewide entities, implementation also relies on sustained interaction between state-level partners and the local agencies responsible for day-to-day operations. State agencies such as ILETSB play a central role in translating statutory requirements into operational standards, while local departments and associations bring essential on-the-ground experience.

Regular opportunities for dialogue—through convenings, structured feedback mechanisms, or association channels—support shared understanding and enable implementation strategies to evolve in response to emerging challenges. Ongoing engagement between state and local partners reinforces shared responsibility for achieving the Act's goals and strengthens coordination across jurisdictions.

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<sup>19</sup> See the National Implementation Research Network (NIRN) at the Frank Porter Graham Child Development Institute: <https://nirn.fpg.unc.edu/>.

## **PUBLIC COMMUNICATION AND COMMUNITY ENGAGEMENT**

Implementation is shaped not only by system-level coordination but also by how the public receives, understands, and responds to changes within the system. Community members are directly impacted by many of the SAFE-T Act’s provisions, and strengthening trust between law enforcement and communities, particularly Black communities that have been disproportionately impacted by the criminal justice system, remains central to the intent of the legislation.

Transparent, accessible communication from state agencies, law enforcement leadership, executive offices, and partner organizations about the Act’s goals, implementation progress, and available resources contributes to public understanding and accountability. Continued engagement with community stakeholders provides space for dialogue, shared problem-solving, and sustained trust-building as implementation evolves.

## **ONGOING IMPLEMENTATION OVERSIGHT AND COORDINATION**

To maintain progress in implementation, strong communication and engagement must be supported by clear oversight and coordination across agencies. With the publication of this report, the Workgroup has formally completed its charge. At the same time, implementation of the SAFE-T Act remains ongoing and continues to require coordination across executive agencies, oversight bodies, associations, and local partners.

The Governor’s Office plans to establish the **SAFE-T Act Policing Provisions Monitoring Workgroup** (working title), composed of workgroup members and representatives responsible for implementation in state agencies, including ILETSB, ISP, ICJIA, OPAC, and the AGO. This group will monitor outstanding implementation issues and coordinate across agencies to ensure visibility into progress, strengthen accountability, and foster collaborative problem-solving throughout the system.

The Monitoring Workgroup will convene twice annually to review implementation progress and determine how to provide support to advance implementation. It will provide Workgroup members and the Justice 20/20 Community Safety Workgroup<sup>20</sup> with a written update on progress on the recommendations in this report. In areas where implementation is determined to be lagging, the Monitoring Workgroup report will include recommendations to address obstacles. The Monitoring Workgroup will also convene its members to define what constitutes meaningful community involvement in police training and to develop clear guidance on integrating community voices into training development and delivery to strengthen the relevance of training, support officer preparedness, and reinforce community trust.

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<sup>20</sup> The Justice 20/20 Network is an inclusive community for policy advocates, grassroots organizers, community members, those who have experienced incarceration and criminalization, and all new learners hoping to make an impact. The Justice 20/20 Community Safety Workgroup seeks to address the policy needs of communities that have been systematically divested from and help support a community-led vision of a thriving neighborhood. ILJP coordinates and administers Justice 20/20. For more information, visit <https://justice2020.org/>.

## **CLARIFYING ILETB'S ROLE AND AUTHORITY**

ILETB's ongoing pursuit of legislative approval of administrative rules through the state's formal rulemaking process underscores the importance of clearly defined authority to interpret and implement SAFE-T Act provisions within its jurisdiction. Clear articulation of ILETB's role in establishing standards and guidance supports consistent application, reduces confusion among agencies, and strengthens implementation statewide.

## **FUNDING FLEXIBILITY AND ALIGNMENT**

Finally, sustained implementation depends on aligning responsibilities and resources. The Illinois General Assembly has appropriated substantial funding to ILETB and other entities to support implementation of the SAFE-T Act. However, portions of this funding may be restricted in ways that may reflect earlier assumptions about implementation needs. As implementation has evolved, some restrictions may no longer align with current priorities.

Greater flexibility within existing appropriations and grant programs, including those supporting training, technology, and body-worn camera implementation, would better position agencies to respond to emerging challenges. For example, unused funds for body-worn cameras could be redirected to support implementation needs across provisions. The Monitoring Workgroup should lead discussions on this matter and propose specific changes.

## **Conclusion**

The recommendations and considerations presented in this report reflect a shared commitment among law enforcement agencies, community partners, oversight bodies, and state leaders to the effective and sustained implementation of the SAFE-T Act's policing provisions. These recommendations build on the substantial work already underway across Illinois and recognize the progress agencies have made in translating statutory requirements into day-to-day practice.

This work has been grounded in shared responsibility—with law enforcement agencies, oversight and accountability bodies, policymakers, and community stakeholders each playing an active role in supporting implementation, monitoring progress, and identifying opportunities for improvement. Sustaining and strengthening this coordination will be essential to ensuring that implementation efforts remain consistent, equitable, and effective across jurisdictions.

Even with this strong foundation, the challenges identified throughout this report highlight the complexity of implementing significant statutory change across diverse contexts. These challenges do not reflect a lack of effort or intent; rather, they point to areas that need clearer guidance, consistent standards, sufficient resources, and ongoing technical support. Addressing these needs strengthens agencies' ability to implement the SAFE-T Act practically, effectively, and in a way consistent with its goals.

The recommendations are intended to support continued progress and strengthen existing implementation efforts. Illinois has established a strong foundation through collaboration and early implementation and is well-positioned to build on that momentum. With sustained commitment and collective learning, the SAFE-T Act’s policing provisions can strengthen public trust, enhance safety, and advance fair, transparent, and effective policing statewide.

## Appendix A: Workgroup Co-Chairs, Member Organizations, and Individual Members

- Co-Chair Honorable Robert Peters (Illinois State Senate)
- Co-Chair Honorable Elgie R. Sims, Jr. (Illinois State Senate)
- Co-Chair Honorable Justin Slaughter (Illinois House of Representatives)

### MEMBER ORGANIZATIONS

- Access Living
- Amdor Nekritz
- American Civil Liberties Union Illinois
- Attorney General Kwame Raoul (Office of the Illinois Attorney General)
- Brookfield Police Department
- Center for Effective Public Policy
- Chicago Appleseed
- Chicago Council of Lawyers Civil Liberties Committee
- Common Cause Illinois
- Families Against Mandatory Minimums
- Hazel Crest Police Department
- Illinois Association of Chiefs of Police
- Illinois Black Advocacy Initiative
- Illinois Coalition to End Permanent Punishments
- Illinois Criminal Justice Information Authority (ICIJA)
- Illinois House of Representatives
- Illinois Justice Project
- Illinois Law Enforcement Training and Standards Board (ILETSB)
- Illinois Municipal League
- Illinois Sheriffs' Association
- Illinois State Police
- Illinois State Senate Office of the Senate President Don Harmon
- Impact for Equity
- Lawndale Christian Legal Center
- Lemont Police Department
- Live Free Illinois
- Loyola University Chicago Center for Criminal Justice
- Montgomery Police Department
- NAMI (National Alliance on Mental Illness) Chicago
- Office of Governor J.B. Pritzker
- Office of Lieutenant Governor Juliana Stratton
- Office of the Champaign County State's Attorney

- Office of the DuPage County State’s Attorney
- Office of the Kane County State’s Attorney
- Office of the President of the Illinois State Senate
- Office of the Speaker of the Illinois House of Representatives
- Oswego Police Department
- Treatment Alternatives for Safe Communities (TASC)
- University of Chicago Law School
- University of Illinois Urbana-Champaign, Cline Center for Advanced Social Research

### **INDIVIDUAL MEMBERS**

- Ahmadou Dramé, Director, ILJP
- Alexa James, former Chief Executive Officer, NAMI Chicago
- Alison Shames, Director, CEPP
- Annie Sweeney, Communications Director, ILJP
- Anna LauBach, Volunteer, ILJP
- Armando Sanders, Deputy Chief of Police, Montgomery
- Arthur Haynes, Program Director, ILJP
- Ashley Hokenson, Deputy Attorney General for Policy, Attorney General’s Office
- Ashley S. Jenkins-Jordan, Chief of Staff to Senate President
- Brendan Kelly, Director, Illinois State Police
- Bria Scudder, Deputy Governor for Public Safety, Infrastructure, Environment and Energy
- Cameron McCulloch, University of Chicago Law School
- Cara Hendrickson, former Executive Director, Impact for Equity
- Cheo Ybarra Lichtenstein, Program Coordinator, ILJP
- Rev. Ciera Bates Chamberlain, Executive Director, LIVE FREE Illinois
- Craig Futterman, Clinical Professor of Law, University of Chicago Law School
- Cyndi Mausser, Senior Manager, CEPP
- Dave Olson, Professor, Co-Director, Center for Criminal Justice, Loyola University Chicago
- David Melton, Acting Director, Chicago Council of Lawyers
- Elizabeth Grossman, former Executive Director, Common Cause Illinois
- Elizabeth Leahy, Firearms Safety Counsel, Illinois State Police
- Ellie Borgstrom, Research Scientist, ICJIA
- Ethan Wellerstein, University of Chicago Law School
- Delrice Adams, Executive Director, ICJIA
- Donovan Williams, Program Manager, ILJP
- Gerald Polanco, Staff Counsel - Criminal Legal Systems, Impact for Equity
- Gregory Chambers, Director of Policy, Illinois Coalition to End Permanent Punishments
- Isabel Kennon, Program Manager, ILJP
- Jae Kwon, Certification Counsel, ILESTB
- Jason Bastin, Chief of Police, Oswego

- Jay Jennings, Research Scientist and Assistant Director of Research, Cline Center, University of Illinois Urbana-Champaign
- Jeffrey Chapman, former Public Service Administrator, ILESTB
- Jenna Mackey, Program Manager, CEPP
- Jersey-Shabazz Hosier, Senior Manager of Policy and Government Affairs, Access Living
- Jim Kaitschuk, Executive Director, Illinois Sheriffs' Association
- Joe Hutchins, Governmental Affairs Deputy Chief, Illinois State Police
- Joel Johnson, President and CEO, TASC
- John Amdor, Lobbyist, Partner, Nekritz Amdor Andersson Group
- Lieutenant John C Thompson, Office of Governmental Affairs, Illinois State Police
- John Coultas, Legislative Affairs Director, Illinois Municipal League
- John Millner, Police Chiefs Lobbyist Illinois, Founder, John J. Millner and Associates, Inc.
- Julia Rietz, Champaign County State's Attorney
- Katherine Pannella, Civil Rights Bureau, Office of Illinois Attorney General
- Kaushy S. Arachchi, Intern, ILJP
- Keith Calloway, Director, ILESTB
- Kenny Winslow, Executive Director, Illinois Association of Chiefs of Police
- Khadine Bennett, Director of Advocacy and Intergovernmental Affairs, ACLU of Illinois
- Lauren Las, Senior Assistant to Deputy Governor, Office of the Governor
- Loren Jones, Impact for Equity
- Marc Maton, Chief of Police, Lemont
- Margaret Cunliffe, former Justice 2020 Fellow, ILJP
- Michael Kuruvilla, Brookfield Chief of Police
- Mitchell Davis, Chief of Police, Hazel Crest
- Orleny Rojas, Senior Manager, CEPP
- Patrick Hahn, In-service Manager, ILESTB
- Patrick Kreis, Chief of Police, Vernon Hills, Illinois Association of Chiefs of Police
- Paula Wolff, Policy Advisor, ILJP
- Robert Berlin, State's Attorney, DuPage County
- Sean Smoot, Chairman, ILESTB
- Shaneva McReynolds, President, Families Against Mandatory Minimums
- Timothy Lavery, Director, Research and Analysis Unit, ICJIA
- Yaacov Delaney, Director - Justice, Equity & Opportunity Initiative, Office of Illinois Lt. Governor

## Appendix B: Subcommittee Co-Chairs and Member Organizations

### REPORTING REQUIREMENTS SUBCOMMITTEE

- Dave Olson, Loyola Chicago Center for Criminal Justice (Co-Chair)
- Ellie Bergstrom, Illinois Criminal Justice Information Authority (Co-Chair)
  
- American Civil Liberties Union of Illinois
- Better Government Association
- City of Champaign Police Department
- Cline Center for Advanced Social Research, University of Illinois Urbana-Champaign
- Cook County Justice Advisory Council
- Effingham County Sheriff’s Office
- Illinois Law Enforcement Training and Standards Board (ILETSB)
- Lake Forest Police Department
- League of Women Voters of Illinois
- Northwestern University Pritzker School of Law
- Metropolitan Water Reclamation District of Greater Chicago Police Department
- Woodford County Sheriff’s Office
  
- Non-affiliated community representatives

### USE OF FORCE SUBCOMMITTEE

- Bob Berlin, DuPage County State’s Attorney (Chair)
  
- Alton Police Department
- American Civil Liberties Union of Illinois
- City of Champaign Police Department
- Chicago Appleseed Center for Fair Courts
- Cook County Justice Advisory Council
- DuPage Metro SWAT
- Illinois Criminal Justice Information Authority
- Illinois Law Enforcement Training and Standards Board
- Impact for Equity
- Kankakee Police Department
- Lake Forest Police Department
- Lake Villa Police Department
- Northwestern University Police Department
- Oak Lawn Police Department
- Skokie Police Department

- University of Illinois Chicago University Police
- Waukegan Police Department

- Non-affiliated community representatives

#### **BODY-WORN CAMERAS SUBCOMMITTEE**

- Chief Jason Bastin, Oswego Police Department (Co-Chair)
- Joe Ferguson, Civic Federation (Co-Chair)

- American Civil Liberties Union of Illinois
- Better Government Association
- City of Champaign Police Department
- Cook County Justice Advisory Council
- Illinois Law Enforcement Training and Standards Board
- Impact for Equity
- Northwestern University Police Department
- Oak Lawn Police Department
- Office of the Governor J.B. Pritzker
- Plano Police Department
- Skokie Police Department
- University of Illinois Chicago University Police

- Non-affiliated community representatives

#### **TRAINING SUBCOMMITTEE**

- Deputy Chief Armando Sanders, Montgomery Police Department (CEPP Consultant and Co-Chair)
- Alexa James, Former Chief Executive Officer of NAMI Chicago (Co-Chair)

- Alton Police Department
- American Civil Liberties Union of Illinois
- City of Champaign Police Department
- Chicago Appleseed Center for Fair Courts
- Cook County Justice Advisory Council
- Better Government Association
- Buffalo Grove Police Department
- DuPage Metro SWAT
- Illinois Criminal Justice Information Authority
- Illinois Law Enforcement Training and Standards Board
- Illinois State Police
- Kankakee Police Department
- Lake Forest Police Department

- Lake Villa Police Department
- League of Women Voters of Illinois
- Lincolnshire Police Department
- Maximized Good LLC
- Metropolitan Water Reclamation District of Greater Chicago Police Department
- North East Multi-Regional Training
- Northwestern University Police Department
- Oak Lawn Police Department
- Plano Police Department
- Skokie Police Department
- Southern Illinois University Edwardsville Police Department
- Waukegan Police Department
- Woodford County Sheriff's Office

**DISCRETIONARY DECERTIFICATION SUBCOMMITTEE**

- Chief Mitchell Davis, Hazel Crest Police Department (Co-Chair)
- Pastor Deric Caples, Live Free Illinois (Co-Chair)

- Alton Police Department
- American Civil Liberties Union of Illinois
- Chicago Council of Lawyers Civil Liberties Committee
- City of Champaign Police Department
- Cook County Justice Advisory Council
- Better Government Association
- Harvey Police Department
- Illinois Attorney General's Office
- Illinois Law Enforcement Training and Standards Board
- Illinois Justice Project
- Impact for Equity
- Kankakee Police Department
- Lake Villa Police Department
- Lisle Police Department
- Skokie Police Department

## Appendix C: Strategic Implementation Steps

### REPORTING REQUIREMENTS RECOMMENDATIONS

#### Recommendation 1: Verify the Active Agency List

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Convene stakeholders</b>	Collaborate with key stakeholders, including ICJIA, ISP/UCR, and Loyola University, to reconcile the list of active law enforcement agencies.	ILET SB, ICJIA, ISP, Loyola University
<b>2. Distribute the verified list</b>	Create a method for distributing the list to stakeholders responsible for determining state compliance rates and collecting required information from agencies.	ILET SB, ICJIA, ISP
<b>3. Ensure ongoing accuracy</b>	Determine a method for notifying ILET SB when agencies are dissolved, updating the list, and distributing the updated list to stakeholders.	ILET SB

#### Recommendation 2: Improve the Compliance Rate

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>4. Identify inactive agencies</b>	In collaboration with ILET SB and possibly sheriffs in the counties where noncompliant agencies are located, determine definitively if any of the noncompliant agencies are inactive.	ICJIA, ILET SB, Sheriffs
<b>5. Contact nonreporting agencies</b>	Reach out directly to the small number of sheriffs' offices that have never reported to understand their reasons for not reporting and to help improve reporting habits.	ICJIA, Loyola University, Sheriffs
<b>6. Develop strategies to improve compliance</b>	Use information from agency outreach to craft strategies to increase overall state compliance. Consider incorporating reporting requirements into leadership training, encouraging leadership to be included in agency reporting notifications, and identifying IT-related options for ISP that address nonreporting and reporting error notifications.	ICJIA, ISP, ILET SB

**Recommendation 3: Clarify Definitions and Create Incentives to Promote Consistent Reporting**

<b>Implementation Steps</b>	<b>Description</b>	<b>Responsible/ Collaborating Agency</b>
<b>1. Revise current guidance</b>	Clarify data definitions and create easy-to-understand explanations of zero reports and mental health incidents that require reporting.	ISP, ICJIA
<b>2. Identify training opportunities</b>	Incorporate information regarding reporting requirements into existing training on the same topics. Develop a basic reporting requirements training within the existing online officer training platform and replicate the email blast process used by ILETSB and ILACP to communicate its availability within the system.	ILETSB, ISP
<b>3. Develop incentives</b>	Display the reporting data in a way that highlights nonreporting agencies and reminds agencies that nonreporting will be displayed by ISP on their website.	ISP, ICJIA

**Recommendation 4: Create Regular Reports and Notifications from Submitted Data**

<b>Implementation Steps</b>	<b>Description</b>	<b>Responsible/ Collaborating Agency</b>
<b>1. Use existing data</b>	Produce a report for the monitoring entity describing what can be learned from the data submitted to date and estimate the potential impact of the nonreporting agencies on the overall statewide levels and trends.	ICJIA, ISP
<b>2. Generate and publish routine findings</b>	Generate a report at least annually of key findings and policy implications based on submitted data and call out issues of noncompliant or incomplete reporting. Develop a communications strategy to distribute the report.	ICJIA, ISP
<b>3. Develop an audit and verification process</b>	Create an audit process like NIBRS to ensure the reported data is complete and accurate.	ISP, ICJIA

## USE OF FORCE STANDARDS RECOMMENDATIONS

### Recommendation 1: Develop a Statewide Model Use of Force Policy

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Form a drafting workgroup</b>	Convene a workgroup that includes a diverse mix of large and small agencies, representatives from labor and insurers/consortia, and community stakeholders to draft a model use of force policy. Endorse the scope of the policy and style guide, adopt a consistent labeling convention (e.g., “required by law” versus “agency choice”), and compile a comprehensive inventory of essential legal requirements to be incorporated into the policy.	ILETSB, ILACP
<b>2. Develop a model policy package</b>	Draft the core policy, clearly tag the legal requirements, and include best practice guidance. Create a one-page adoption guide and a statute-to-policy crosswalk indicating where each statutory requirement is reflected in the model.	ILETSB, ILACP
<b>3. Pilot and publish</b>	Field-test the model policy with 4–6 diverse agencies; gather feedback from line staff, supervisors, and insurers; complete a counsel review; and finalize and publish an editable template, FAQs, and an annual update schedule on the ILETSB website.	ILETSB

### Recommendation 2: Enhance the ILETSB Portal for Voluntary Policy Upload and Statutory Attestation

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Define the content and protections</b>	Assess what content, checklists, and safeguards the portal must support at a minimum, including the feasibility of a plain-language yes/no checklist, required upload formats, accessibility and language options, role-based visibility, and data retention.	ILETSB
<b>2. Pilot and refine</b>	Recruit a pilot group of 2–3 agencies, focusing on small, rural, and less resource-rich departments. The pilot could include light onboarding supports, such as instructions for uploading and mapping policies to requirements. Run brief user interviews to gather feedback, and monitor key metrics, including completed uploads, submitted attestations, common confusion points, and time to complete tasks. Use the data to fix rough spots, document lessons learned, and publish a timeline for wider rollout.	ILETSB

**Recommendation 3: Publish Plain Language Policy Updates and Seek Community Input Where Feasible**

<b>Implementation Steps</b>	<b>Description</b>	<b>Responsible/ Collaborating Agency</b>
<b>1. Publish a plain-language communications kit</b>	Develop and distribute a communications toolkit comprising a one-page “Our Use of Force Policy at a Glance” template, a short FAQ, and a glossary. Include labeling conventions (“required by law”/“agency choice”), examples of “what changed and why,” and guidance on accessibility/translation. Complete a counsel review before release.	ILETSB
<b>2. Set a posting protocol</b>	Assign a local communications lead, adapt the template to the current policy, and post it on the agency website within 15–30 days of any UOF update.	Local agencies
<b>3. Offer a light-touch community input option</b>	Where feasible, host a 30-minute briefing or open-comment forum during the update window with existing boards/partners. Publish a one-page recap (“what we heard/what we did”) and note any follow-up items for the next revision cycle.	Local agencies

**BODY-WORN CAMERAS RECOMMENDATIONS**

**Recommendation 1: Promote Access to FOIA Training and Guidance on BWC Footage**

<b>Implementation Steps</b>	<b>Description</b>	<b>Responsible/ Collaborating Agency</b>
<b>1. Convene law enforcement associations</b>	Meet with ILETSB, the Illinois Sheriffs’ Association, and the Illinois Association of Chiefs of Police to identify opportunities to broadly promote existing resources to member agencies and front-line personnel.	OPAC, ILETSB, Illinois Sheriffs’ Association, ILACP
<b>2. Create and maintain a centralized FOIA/BWC resource hub</b>	Create a single, easy-to-navigate webpage that consolidates FOIA and BWC resources from the Illinois Attorney General’s Office and other partners.	OPAC
<b>3. Promote resources</b>	Continue developing and updating webinars, FAQs, model responses, and practice tips, and actively promote these materials to law enforcement agencies.	OPAC

## Recommendation 2: Widely Distribute ILET SB Grant Information

Implementation Steps	Description	Responsible/ Collaborating Agency
1. <b>Distribute regular grant updates</b>	Send periodic bulletins or email alerts summarizing new funding opportunities and practical guidance for applying.	ILETSB
2. <b>Host grant awareness and training sessions</b>	Partner with law enforcement associations to conduct webinars or workshops that help agencies identify and pursue available funding.	ILETSB
3. <b>Prominently feature grant information</b>	Highlight a dedicated grant section on the ILET SB website homepage or main navigation to ensure agencies can quickly access current opportunities, deadlines, and eligibility details.	ILETSB

## Recommendation 3: Create a Template BWC Webpage for Law Enforcement Agencies

Implementation Steps	Description	Responsible/ Collaborating Agency
1. <b>Develop a standard webpage template</b>	Create a template for agencies to clearly explain the purpose, use, and limitations of BWCs.	ILETSB
2. <b>Include FAQs and key information</b>	Populate the template with common questions and answers to address public concerns and promote understanding.	ILETSB
3. <b>Distribute and promote the template</b>	Share the template with all law enforcement agencies and provide guidance on customizing it for their local context.	ILETSB

## TRAINING PRACTICES RECOMMENDATIONS

### Recommendation 1: Adopt Interactive Learning Tools

Implementation Steps	Description	Responsible/ Collaborating Agency
1. <b>Assess current capabilities and needs</b>	Review existing online training modules to identify what interactive features (if any) already exist, what mandated topics would benefit most from interactive learning, and what technology gaps need to be filled.	ILETSB, MTUs, training academies
2. <b>Evaluate technology options and feasibility</b>	Explore platforms and tools used in other jurisdictions. Assess available learning technologies that support interactive features. Determine compatibility with existing academy and MTU systems, and assess cost and implementation feasibility.	ILETSB, MTUs, training academies
3. <b>Pilot and refine</b>	Develop a small-scale pilot module with one or two academies or MTUs to test functionality, gather user feedback, and refine the approach before broader rollout.	ILETSB, MTUs, training academies

### Recommendation 2: Conduct a Comprehensive Cost and Funding Analysis

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Explore consultant options</b>	Identify, vet, and select an outside consultant with demonstrated experience in government cost analysis and financial management to lead the assessment.	ILET SB, ICJIA, GOMB
<b>2. Design and plan</b>	Work with the consultant to define the analysis scope, identify data and information needs, and outline key activities, timelines, and deliverables.	ILET SB, ICJIA, GOMB
<b>3. Conduct the analysis and develop recommendations</b>	Support the consultant in conducting the assessment, reviewing findings, and identifying improvement strategies.	ILET SB, ICJIA, GOMB

### Recommendation 3: Create a Public Dashboard to Share Aggregated Training Data

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Assess current and potential data needs</b>	With assistance from MTUs, law enforcement training academies, IT/data staff, and community transparency or oversight groups, review the types of training data currently collected and reported, and identify any additional data that would be valuable and of public interest.	ILET SB, MTUs, training academies
<b>2. Engage technical expertise</b>	Partner with a dashboard developer to design and build a user-friendly dashboard that allows for secure, easily downloadable, and regularly updated data.	ILET SB
<b>3. Pilot and refine</b>	Test the dashboard internally and with stakeholders to ensure accuracy, usability, and clarity before public release.	ILET SB

### Recommendation 4: Develop Clear, Standardized Descriptions for All Mandated Training Courses

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Review the current training catalog</b>	With MTUs and law enforcement training academies, compile a complete list of all mandated training and gather existing course materials that can inform the development of clear, standardized descriptions.	ILET SB, MTUs, training academies
<b>2. Develop a description framework</b>	With community transparency or oversight groups and selected pilot stakeholders, create a simple, consistent format for each description. Avoid jargon. Pilot a few examples and adjust based on stakeholder feedback.	ILET SB
<b>3. Publish and maintain descriptions</b>	Make the finalized descriptions publicly accessible through the training data dashboard (Training Recommendation 3) and other platforms, and establish a process for updating them as courses change or new courses are certified.	ILET SB

### Recommendation 5: Develop Statewide Guidance for Incorporating Community Perspectives into Training

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Convene subcommittee</b>	Identify who should be involved in the effort and form a subcommittee to carry out the detailed work under the monitoring entity’s oversight.	Monitoring Workgroup
<b>2. Design the process</b>	Develop a structured plan for how the subcommittee will gather input—such as through meetings, surveys, and listening sessions—to ensure a wide range of community and law enforcement perspectives are represented. Review approaches used in other states and identify best practices that can inform an effective, inclusive model for community involvement.	Monitoring Workgroup
<b>3. Define and document shared standards</b>	Develop clear definitions and criteria for what “meaningful community involvement” looks like in practice. Create guiding principles and practical strategies that law enforcement training entities across the state can use to consistently and constructively engage communities in curriculum development and delivery.	Monitoring Workgroup

## DISCRETIONARY DECERTIFICATION RECOMMENDATIONS

### Recommendation 1: Standardize the Intake Process and Provide Officers with Timely Information

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Review intake materials and create officer handouts</b>	Convene a small drafting team (ILETSB staff/counsel + 3–5 agency representatives) to lock required fields, triage criteria, milestone triggers for handouts, and the single point of contact.	ILETSB
<b>2. Launch the web companion</b>	Stand up a read-only webpage with forms, instructions, FAQs, and accessibility checks.	ILETSB
<b>3. Pilot and define success metrics</b>	Treat the initial statewide rollout of hearings as a natural pilot phase; track completeness rate, median time to charging decision, and on-time delivery of officer handouts after a notice is complete; refine materials; and set the statewide rollout schedule with a consistent update cycle.	ILETSB

### Recommendation 2: Develop a Public Decertification Dashboard, Improve the Officer Lookup Tool, and Provide Regular Briefings

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Explore the feasibility of a dashboard</b>	Evaluate what is needed to stand up a dashboard, including questions it should help answer and how frequently data would need to be refreshed. As part of this assessment, explore the minimal technical and data requirements, for example, what data dictionary and plain-language labels would be needed, and privacy thresholds. Incorporate a staged-disclosure strategy to provide public reporting while safeguarding due process.	ILETSB
<b>2. Redesign the officer lookup</b>	Simplify the search options (name, agency, status), clarify what can legally be shown, add clear disclaimers, and make it mobile-first. Implement basic safeguards (audit log, change control) and have counsel validate fields prior to release. Ensure the new lookup aligns with the dashboard's definitions.	ILETSB

### Recommendation 3: Coordinate with the Attorney General's Office on Legislative Cleanup Efforts

Implementation Steps	Description	Responsible/ Collaborating Agency
<b>1. Set up a coordination lead</b>	Set up a meeting or call with the Attorney General's Office to develop an understanding and coordination plan that monitors legislative cleanup efforts and understand how they impact implementation gaps and priorities.	Monitoring Workgroup/AG's Office
<b>2. Build the watch list and brief template</b>	Create a living tracker (bill/rule ID, sponsor, status, summary) and a one-page neutral brief template covering change summary, workflow effects, officer and community-facing communications, data/reporting implications, and decision points.	Monitoring Workgroup/AG's Office