
REFORM/TRANSFORM:

An Analysis of Policing Policy and Budgets in Oak Park, Illinois

April 2020



Acknowledgements

This analysis represents a tremendous amount of research and organizing by the residents who make up Freedom to Thrive Oak Park. We acknowledge the Freedom to Thrive Oak Park organizers, researchers, and lawyers who contributed to this report, all of whom were unpaid for their work. Freedom to Thrive Oak Park is dedicated to continuing this research to complete the Reform/Transform analysis in other policy areas.

We are grateful for the guidance, leadership, and partnership of Local Progress and Center for Popular Democracy staff, for their help in creating, editing, and helping to publish this report. The research contained in this brief relies on the methodology developed by the Center for Popular Democracy and Local Progress for the Reform/Transform toolkit. Many organizations, organizers, individuals, government officials, and former law enforcement officers lent their expertise to the development of the Reform/Transform toolkit. You can read a full list of those acknowledgements and more about Reform/Transform at reformtransform.org.

Finally, we'd like to acknowledge the organizing work of the youth-led group ROYAL: The Revolutionary Oak Park Youth Action League. ROYAL's critical organizing work in Oak Park serves as the moral compass for Freedom to Thrive Oak Park's research and advocacy work. It is for the ROYAL youth organizers and for all of the young people of color in our community that we, as adult allies, are committed to continuing this work.

An acknowledgement about the scope of this project:

The Reform/Transform toolkit aims to evaluate policy and to give policymakers, organizers, and activists the tools to push stronger policies on police reform. We recognize that lived experience and implementation of policy are crucial in their own right and may well differ from the stated policy on the books.

About the authors



Freedom to Thrive Oak Park is a group of community organizers working to re-imagine community safety in Oak Park, IL.

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Local Progress is a movement of local elected officials advancing a racial and economic justice agenda through all levels of local government. We are elected leaders who build power with underrepresented communities, share bold ideas and policy among our network, and fight to reshape what is possible in our localities all across the country.

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Youth with ROYAL: The Revolutionary Oak Park Youth Action League march to Village Hall (photo by Paul Goyette)

Introduction and summary

Introduction

Oak Park, Illinois is a village that has long branded itself as a “progressive” enclave. Residents often point to the actions taken in 1968, when a divided Oak Park community and Village Board passed a Fair Housing Ordinance which made it illegal to use race as a basis to discriminate against anyone seeking to rent or buy a property in Oak Park.¹ Since that time, Oak Park has become one of the most racially integrated cities in Illinois.² Many Oak Park residents move to Oak Park because of the intentional commitment Oak Park has made to diversity and integration. The Oak Park of today is a community where the diversity of the community is still valued, but the people that represent that diversity don’t have access to the same opportunities as their white counterparts. The greatest evidence of this gap is the ever-growing educational opportunity gap in both Oak Park school districts, where white students score significantly higher test scores than students of color.^{3 4}

Community organizers have coalesced to demand the enactment of racial equity policies in both school districts, with both districts responding affirmatively to the requests. But an educational opportunity gap won’t be solved by simply enacting a racial equity policy in schools. In order to address the educational opportunity gap, a holistic approach must be applied to determine what issues are faced by young people and families of color in every aspect of their life in Oak Park. One glaring issue we heard about over and over again from young people was the over-policing of young Black and brown people in Oak Park. While these reports haven’t received significant attention from the press, young Oak Park organizers are ensuring that the community is aware of the issue and they are demanding change.^{5 6 7}

Freedom to Thrive Oak Park was formed as a response to these community reports, with the mission to understand the current state of public safety in Oak Park. We hope to use this knowledge and work to redefine and reimagine what public safety looks like in our community so that everyone, no matter their race, religion, gender identity or expression, ability status, immigration status, or income level, has the freedom to thrive, however they define thriving. We drew inspiration from the first Freedom to Thrive report,⁸ and chose to use the Reform/Transform toolkit as a framework to help us understand the current state of public safety in our community. This report will be the first in a series of reports where we will examine, in depth, the current definition of public and community safety in Oak Park. We believe that examining community safety is critical to addressing not only the reformation and transformation of policing and public safety in our community, but also for creating an environment where our young people feel welcome, safe, and at home, so that they have the freedom to thrive in Oak Park.

About the Reform/Transform project

In 2018, Local Progress launched [Reform/Transform: A Policing Policy Toolkit](#) to provide local elected officials, policymakers, and organizers with a resource on how to evaluate policing reforms by a set of standardized criteria across jurisdictions.

Over the course of 2019, Local Progress engaged local elected officials and community leaders in a range of communities to evaluate their localities’ policing practices using the Reform/Transform toolkit on issues related to use of force, independent oversight, co-optation of local law enforcement for federal immigration reform, and investments in public safety beyond policing. To provide an analysis that allows for cross-jurisdiction learning and comparisons when applicable, Reform/Transform researchers developed a scoring methodology. This was employed in Reform/Transform first [published analysis of policing policy in 12 cities](#), selected in consultation with local elected officials in those localities.

Currently, Local Progress is engaging local elected officials and community organizations in a range of localities around the country to explore Reform/Transform analyses in their communities.

About Oak Park

| | | |
|---|------------------------------|---|
| 52,229 Total Population | 7.7% Latinx | 0% American Indian and Alaska Native |
| 8.0% Poverty status in the past 12 months | 19.8% Black/African American | 0.1% Native Hawaiian and Other Pacific Islander |
| 152 ⁹ No. of Police | 68.6% White, non-Hispanic | 4.6% Two or more races |
| | 4.5% Asian | |

Source for demographic info: https://factfinder.census.gov/bkmk/table/1.0/en/ACS/17_5YR/DP05/1600000US1754885

Summary

To inform residents about where Oak Park’s public safety policy is on a strong path and where it falls short, Freedom to Thrive Oak Park and Local Progress analyzed the following Village policies related to law enforcement:

- Independent oversight of policing
- Use of Force
- Co-optation of law enforcement for federal immigration enforcement
- Budget in investments in public safety beyond policing.

Our findings indicate that Oak Park’s policies reflect mixed results: some policies are strong—notably its protections against law enforcement being co-opted for immigration enforcement—whereas others could be significantly strengthened. Analyzing village policy utilizing Reform/Transform methodology, we found the following results:

| | |
|---|--|
| Independent oversight | Significant Room for Improvement |
| Use of force | Making Progress With Need for Improvement |
| Co-optation of local law enforcement for federal immigration enforcement | On Track to a Strong Policy |
| Amount spent on policing vs. social services | Oak Park spends more on policing than it does on social services such as affordable housing and youth services. |

Lexipol

On Jan 28, 2019, Oak Park's Village board voted to approve a contract with Lexipol,¹⁰ a company that provides state-specific public safety policies designed to reduce risk and avoid litigation. Lexipol is used by more than 3,200 public safety organizations in 35 states.¹¹ We are concerned that policy derived from Lexipol's guidance will prioritize risk mitigation and financial concerns over democracy, justice, and true public safety.

Freedom to Thrive researchers learned that Lexipol is being used to update the current general orders of the police department. General orders are internal operating guidelines for policing. These policies are not reviewed by any citizen commission, or elected board. What's more, the general orders are not freely available to the public. Freedom to Thrive Oak Park obtained Oak Park's general orders relevant to this report through a Freedom of Information Act (FOIA) request. The general orders evaluated in this report represent the current and former versions of the orders. It is unknown what changes, if any, the Lexipol-written general orders will contain. But any changes written by Lexipol should be viewed with a critical lens.

When Lexipol is employed by a municipality to draft police policy, Lexipol's stated goals of risk reduction and the avoidance of litigation can often mean the lack thereof or the hindrance to accountability or oversight.¹² As Oak Park's Independent Oversight analysis shows, police oversight is an area in need of serious improvement, and Lexipol's drafting of police policy without civilian or even elected oversight further obfuscates the policing process in Oak Park, and creates even more barriers to implementing citizen-led progressive policing reform.

In fact, Lexipol demonstrates resistance to progressive policy reforms, as shown by their rebuttal of advocate-proposed changes to the Chicago Police Department's Use of Force policy.¹³ Lexipol cites significant legal liabilities to officers and police departments in their resistance to the proposed policy.¹⁴ Given the language used by Lexipol in their blog post, and Lexipol's stated purpose of reducing risk for public safety departments, and their conspicuous lack of regard for the risks of the public at large, it is clear that use of Lexipol should be heavily questioned by any municipality dedicated to enacting progressive policing reforms.

Independent oversight

Significant Room for Improvement

Topline Findings

Dozens of jurisdictions across the country have some type of independent civilian oversight of law enforcement, but many civilian oversight bodies in localities across the country lack the characteristics necessary to conduct effective oversight.¹⁵ Effective oversight is only possible if oversight bodies are independent from the police department, representative of communities most impacted by police brutality, adequately funded, granted subpoena power, and equipped with full investigatory and disciplinary power.

Utilizing methodology developed by Reform/Transform researchers, we analyzed Oak Park's [village code related to its citizens police oversight committee](#),¹⁶ and we determined its score to be **Significant Room for Improvement**.

- Oak Park's oversight policy does not require investigations be completed independently of the police department, nor does it require them to be completed within 120 days.
- The oversight committee does not have sufficient investigatory power, such as the ability to issue subpoenas or compel testimony, witnesses, and documents. Additionally, the statute does not grant the oversight committee any disciplinary authority pending its investigations, nor does it provide for adequate resources to fund investigative and legal capacity.
- While Oak Park's village code asks that the appointment of committee members reflect the diversity and backgrounds of Oak Park's residents, it does not clearly require members to be representative of communities most impacted by police surveillance and brutality.
- For true independence, a civilian review board should not be majority selected by the Village President. In fact, recent appointments to the Citizen Police Oversight Commission reflect this need for reforming the selection process for CPOC commissioners.¹⁷
- With regard to public access and transparency, residents can file complaints in person, by phone, or online, but the complaints process is not conducted independently of the police department. There is no required public reporting of complaints and the status of investigations. Additionally, the current Village Board has failed to receive the semiannual reporting from CPOC that is required by village code.¹⁸

Our Findings

Independence: Does the Civilian Review Board conduct investigations independently of the police department?



Does the Civilian Review Board conduct investigations independently of the police department?¹

Disciplinary Authority: Does the Civilian Review Board have disciplinary authority?



Does the Civilian Review Board have independent disciplinary authority?²

Community: Does the Civilian Review Board have membership that reflects the diversity, expertise, and connection to the community?



Does the legislation explicitly have a statement about diversity of the board?³








Does the legislation require the membership of community members most impacted by police surveillance, abuse, and brutality?⁴








Does the mayor appoint less than 50% of board members? (For true independence, members should not be majority-appointed by the mayor.)⁵

Investigatory Powers: Does the Civilian Review Board have necessary investigatory powers?

-  Does the Civilian Review Board conduct investigations independently of the police department?⁶
-  Does the Civilian Review Board have either subpoena power or administrative powers that enable direct and unfettered access?⁶
-  Does the Civilian Review Board have the power to compel witnesses?⁷
-  Does the Civilian Review Board have the power to compel testimony?⁸
-  Does the Civilian Review Board have the power to compel documents?⁹

Public Access: Does the Civilian Review Board have public access that allows residents to file complaints through a variety of methods and during non-business hours?





Can residents file complaints:¹⁰

-  by phone?
-  online?
-  in person?
-  after hours and during the weekend?
-  in multiple languages/ locations?


Our methodology

Freedom to Thrive Oak Park and Local Progress evaluated the jurisdiction based on a full set of policy criteria as developed in the [Reform/Transform toolkit](#). We utilized the Reform/Transform ranking methodology to assign a score to Oak Park for its independent oversight policy. Please see Appendix A for more on this methodology.




Funding: Does the Civilian Review Board have necessary funding for thorough and timely investigations?

-  Are investigations completed within 120 days?
-  Is funding no less than 5% of the total police department budget?¹¹
-  Is funding tied to the police department's non-capital budget (so that increases in the police department budget result in increases in funding for oversight)?¹²
-  Does funding cover an investigative staff, with at least one investigator for every 70 police officers or four investigators at all times (whichever is greater)?¹³

Policies and Practices: Does the Civilian Review Board have broad jurisdiction to investigate police department policies and practices (may also be in form of an inspector general or commission)?

-  Does the CRB, inspector general, or police commission have authority to review and make recommendations on police department policies and practices?¹⁴

Transparency: Is the Civilian Review Board transparent to the public on complaints and dispositions (without personally identifiable information)?

-  Are reports issued quarterly, and to the public?¹⁵
-  Do reports include demographics of complainants?¹⁶
-  Do reports include status and findings of investigations and actions taken as a result of investigations?¹⁷

Use of force

Making Progress With Need for Improvement

Topline findings

The United States has a grave problem with police use of force. In 2017, 1,147 people were killed by police.¹⁹ Despite pervasive use of force employed by police departments across the country, there is no national standard governing use of force policies,²⁰ which leads to significant challenges and subjectivity when attempting to hold officers accountable for excessive use of force.²¹ To achieve greater accountability, local elected officials can play an important role in advocating for strong use of force policies that prioritize the sanctity of life, put limits on the type of force officers can use and under what circumstances, and require robust data collection and reporting.

In Oak Park, we examined use of force policies by obtaining, via public records request, the police department's general orders on officer use of non-lethal and deadly force, issued in October 2007.²² Oak Park's general orders are currently being updated (see Lexipol section), and the new policies were not available at the time of our analysis.

Utilizing methodology developed by Reform/Transform researchers, we determined that Oak Park's use of force policy is characterized as **Making Progress With Need for Improvement**.

- The general order on deadly force expresses a clear commitment that “reverence for the value of human life shall guide officers in considering the use of deadly force.” As well, the general orders provide guidance on an escalation of force and define which types of force are permitted to be used to respond to different types of resistance.
- While Oak Park's use of force orders do place some limits on the use of deadly force, they do not explicitly prohibit officers from using chokeholds or strangleholds, nor do the orders ensure proper accountability and community review of serious incidents of use of force. It is unclear whether the policies require officers to participate in de-escalation training each year with scenario-based training.
- Moreover, Oak Park's orders on use of force do not require officers to intervene to stop the use of excessive force.
- Overall, public reporting is lacking, as the policy does not require explicit, detailed, and regular public reporting requirements. Indeed, we only obtained the general orders via a public records request.

Our Findings

Commitment to Life: Does the policy explicitly express a commitment to preserve lives/protect the sanctity of life?



Does the policy explicitly express a commitment to preserve lives/protect the sanctity of life?¹

Officer Intervention: Does the policy explicitly state that officers must, when possible, intervene to stop the use of excessive force?



Does the policy explicitly state that officers must, when possible, intervene to stop the use of excessive force?

Accountability: Does the policy include provisions regarding accountability, such as requiring an incident be reported to a supervisor?



Does the policy state that the incident must be reported to a supervisor?²





Does the policy require that a review board review all serious incidents of use of force?







Does the policy require that civilians sit on the review board?



Force Continuum: Does use-of-force policy establish a use of force continuum that defines types of force or weapons that can be used to respond to different types of resistance?

-  Does the policy include a use-of-force continuum or matrix?³
-  If so, does the continuum or matrix define the types of force or weapons that can be used to respond to different types of resistance?⁴

Limitations: Does use-of-force policy put the following limitations on officers: ban chokeholds and strangleholds; require verbal warnings; prohibit from shooting at moving vehicles; require officers to exhaust all reasonable alternatives before shooting?

-  Does the policy explicitly prohibit chokeholds or strangleholds?⁵
-  Does the policy explicitly require officers to give a verbal warning before using deadly force?⁶
-  Does the policy explicitly prohibit officers from discharging a firearm at or into a moving vehicle (other than for defense of life)?
-  Does the policy state that officers may only use firearms in the defense of life or to prevent serious bodily injury?⁷

De-escalation Training: Does the policy require officers to participate in de-escalation training every year?













-  Do officers have to participate in a de-escalation training every year?
-  Does the curriculum include scenariobased training?

Our methodology









Freedom to Thrive Oak Park and Local Progress evaluated the jurisdiction based on a full set of policy criteria as developed in the [Reform/Transform toolkit](#). We utilized the Reform/Transform ranking methodology to assign a score to Oak Park for its use of force policy. Please see Appendix A for more on this methodology.

Public Reporting: Does the policy have explicit, detailed, and regular public reporting requirements?

Does the department report statistics on:

-  the type of force?
-  the type and degree of injury to suspect and officer?⁸
-  date and time of incident?⁹
-  location of incident?¹⁰
-  officer's unit, station, and assignment?
-  number of officers that used force in the incident?
-  officer's activity when force was used?¹¹
-  subject's activity when force was used?¹²
-  demographic information of officer?¹³
-  demographic information of subject?¹⁴
-  outcome of any investigation?¹⁵
-  Are there opportunities for public hearings to report on and explain data?

After an officer-involved shooting, is local law enforcement required to publicly report:

-  the names of officers involved in the shooting?
-  officers' commands?
-  officers' tenure on the job?
-  the type of firearm or weapon used?
-  the number of shots fired?
-  Is local law enforcement required to release this information within 48 hours of the incident?
-  Is local law enforcement prohibited from releasing mugshots of victims to the public?
-  Is the policy posted on a website for public viewing?¹⁶

Co-optation by Federal Immigration Enforcement

On Track to a Strong Policy

Topline findings

Hundreds of local jurisdictions restrict cooperation with immigration enforcement to some extent. The vast majority of these restrictions aim to stop the co-optation of local law enforcement, because over the last decade, the federal government has increasingly relied on local criminal justice systems as force multipliers to carry out immigration enforcement.

Cities and counties can resist these tactics through a variety of laws and policies limiting the extent to which local resources, ostensibly devoted to public safety and crime prevention, can be diverted to support enforcement of civil immigration laws. In doing so, they can make clear that local resources and local government prioritizes the safety and inclusion of all residents, regardless of immigration status.

Oak Park has a [Welcoming Village ordinance](#) that ensures the village's resources and law enforcement are not co-opted for federal immigration enforcement.²³ Analyzing the ordinance by utilizing the methodology developed by Reform/Transform researchers, we determined Oak Park's score to be **On Track to a Strong Policy**.

- The ordinance requires law enforcement agencies to refuse to comply with Immigration and Customs Enforcement (ICE) detainer holds or request for notification of the release of those detained.
- The ordinance also prohibits law enforcement from asking about immigration status, prevents law enforcement from sharing information about those detained with federal immigration authorities, and prohibits ICE from conducting interviews with those detained.
- Oak Park does not have a 287(g) agreement, an intergovernmental service agreement, or any other agreement or contract with federal immigration authorities.

Our Findings

Custody: Does local law enforcement refuse to keep individuals in local custody for a longer period of time at the behest of immigration authorities?



Do your local law enforcement agencies refuse to comply with ICE detainer requests?¹



Does your jurisdiction have a formal policy—either an ordinance or an administrative policy—prohibiting compliance with ICE detainers?²

Rights Trainings: Do local jails that allow access by immigration authorities have “know your rights” trainings for those in custody? Do they require that immigration authorities clearly identify themselves to those they interview?



Does the policy require “know your rights” trainings?

Immigration Interviews: Do local jails prohibit federal immigration authorities from interviewing, or having any access to, individuals in local custody without a signed judicial warrant?



Does your jurisdiction have a formal policy in place codifying procedures relating to immigration authorities in the jails?³



Does your local jail prohibit immigration authorities from conducting interviews in the jail?



If not, does your local jail educate those in custody about their right to refuse to talk to immigration authorities?





Do jail staff ensure that immigration officials identify themselves clearly before speaking with anyone in custody?






Does the policy require that authorities identify themselves to those they interview?



Release Notification: Do law enforcement refuse requests by immigration authorities to notify them of the date, time, or place of any individual’s release from custody absent a judicial warrant requiring such?

-  Do your local law enforcement agencies refuse to respond to ICE requests for notification of release?⁴
-  Do you have local laws or departmental policies that prohibit the sharing of release-information with immigration authorities?⁵


Information Sharing: If immigration authorities solicit such information, do law enforcement agencies decline to share it? Are officers to exercise discretion where appropriate?

-  Are there local policies in place to guide local law enforcement agencies and officers in responding to requests for information from federal immigration authorities?⁶
-  Do these policies preserve the discretion of local law enforcement when it comes to the sharing of information about immigration status?⁷
-  Do these policies prohibit the sharing of any other kinds of personal or confidential information?⁸




Status Inquiry: Do law enforcement inquire about an individual’s immigration status?

-  Are there state or local laws in place prohibiting local law enforcement officers from inquiring about immigration status?⁹
-  If not, is there an absence of any state or local law explicitly permitting or requiring that law enforcement inquire into immigration status?

Collaboration Policies: Do laws and policies restricting collaboration between law enforcement and federal immigration authorities make exceptions on the basis of prior criminal convictions?

-  Do your state and local laws or policies prohibit detainer compliance, information sharing, and/or jail access whether or not a person has certain criminal convictions?¹⁰

Contracts: Is local law enforcement prohibited from entering into contracts with federal immigration authorities for (1) the housing of immigration detainees in local jails, or (2) the deputization of local police to act as federal immigration agents?

-  Does the jurisdiction not have contracts with ICE (for any purpose)?
-  Does the jurisdiction not have an intergovernmental service agreement with the federal government, renting out bed space to ICE in the local jail?
-  Does the jurisdiction not have an agreement, under section 287(g)5 of the Immigration and Nationality Act (INA), which allows local police to be deputized as immigration agents?¹¹

Our methodology

Freedom to Thrive Oak Park and Local Progress evaluated the jurisdiction based on a full set of policy criteria as developed in the [Reform/Transform toolkit](#). We utilized the Reform/Transform ranking methodology to assign a score to Oak Park for its policy related to co-optation of local law enforcement for federal immigration enforcement. Please see Appendix A for more on this methodology.

Budget priorities

Topline findings

At both the national and local levels, governments have dramatically increased their spending on policing while drastically slowing investment in social safety net programs. This spending discrepancy creates an environment that is overly weighted towards policing, while starving the community of services which foster true public safety; a living wage, access to health services and treatment, educational opportunity, and stable housing. Instead of following national trends, Oak Park should allocate its spending in ways that create an environment where all of its members can thrive.

Of Oak Park’s six governing bodies, only the Village of Oak Park is responsible for funding the local police department. Utilizing methodology developed by Reform/Transform researchers, we analyzed Oak Park’s [2019 Village budget](#) and determined Oak Park’s spending on policing vastly outpaces its investments in supportive social services.²⁴

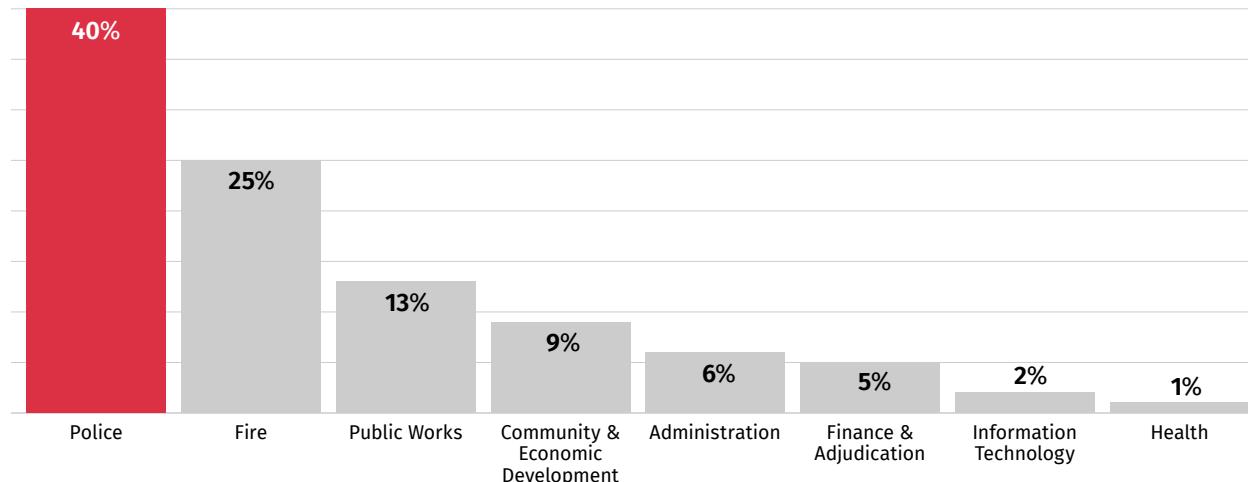
- The Village of Oak Park spends \$413 more per resident on policing than it does for supportive services. By comparison, Chicago spends \$310 more per resident on policing than supportive services.
- Excluding pensions, the Village of Oak Park allocated 39.6% of its General Fund expenditures to the Police Department. In contrast, 5% of the Village’s General Fund is dedicated to social services including affordable housing, health services, and youth development programs.
- The Oak Park Police Department was allocated 152 full time employees: 121 sworn officers and 31 are civilian staff in support roles. The Police Department accounts for 40% of all full-time Oak Park village employees.
- The Village of Oak Park directly funds affordable housing programs, health services, and youth development programs through the village’s General Fund. Unlike the Police Department, these much smaller expenditures can be found as line items within larger departmental budgets.

Key visuals

Per capita spending: ²⁵

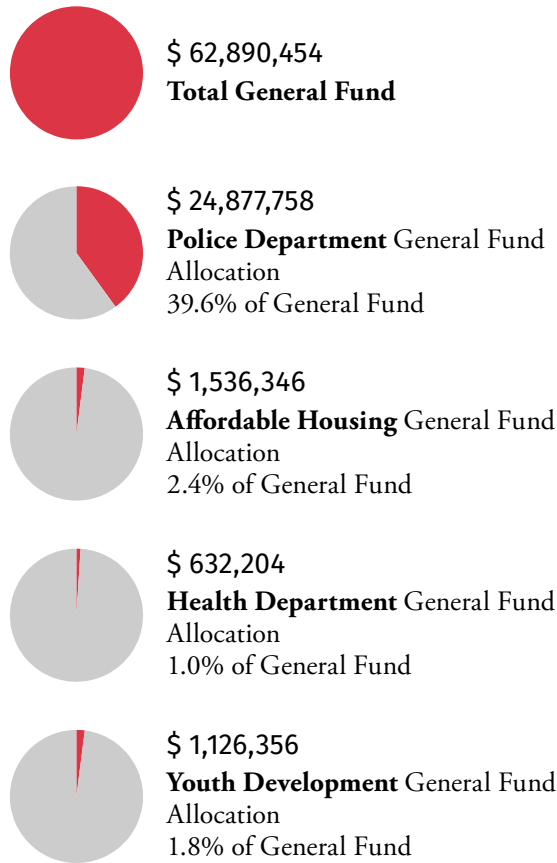
| | | |
|----------------------|-----------------|--|
| Police & corrections | Social services | Amount spent on policing over services |
| \$476 | \$63 | \$413 |

General fund expenditures:

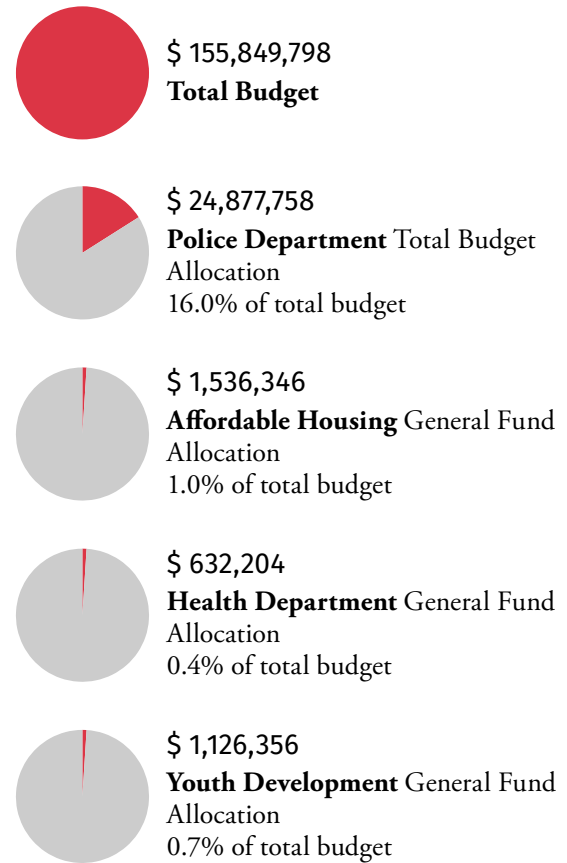


Source: Village newsletter January/February 2019⁴²

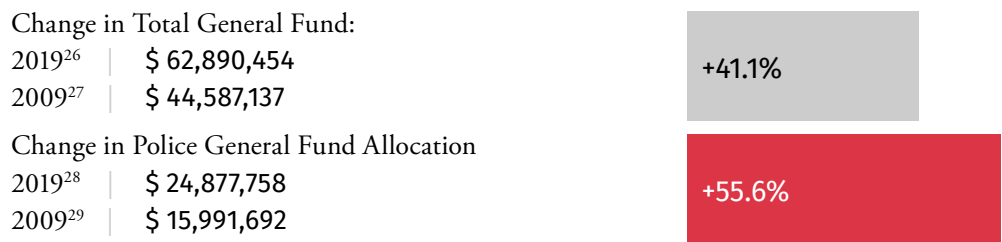
How much does the city allocate **from the general fund (FY 2019)** to the police and corrections departments versus community resources and programs?



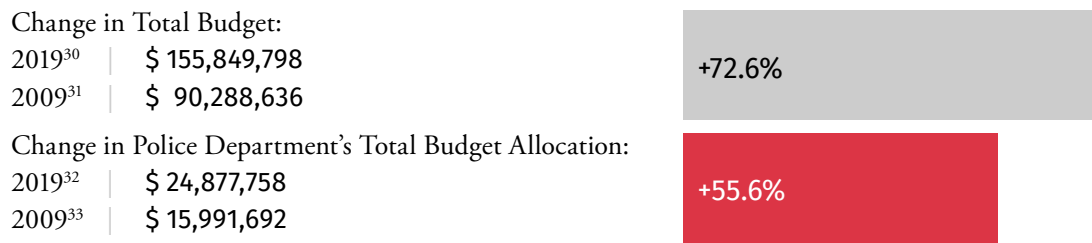
How much does the city allocate from the **total budget (FY 2019)** to the police and corrections departments versus community resources and programs?



In the last 10 years, how much have general fund allocations to police and corrections departments **increased, relative to the overall growth of the general fund?**



In the last 10 years, how much have total budget allocations to police and corrections departments **increased, relative to the overall growth of the total budget?**



Our methodology

Freedom to Thrive Oak Park and Local Progress evaluated the village's budget based on a full set of criteria as developed in the [Reform/Transform toolkit](#). We assessed expenditures on policing and corrections compared to some of the resources and programs that truly keep communities safe: jobs programs, mental health services, and youth development programs. Please see Appendix A for more on this methodology.

Conclusions

Oak Park, Illinois is a city with a long history of progressive struggle for affordable and fair housing, integrated communities, and strong environmental advocacy. Oak Park falls short, however, in ensuring that the diversity so valued by the community leads to all residents having the same ability and freedom to thrive as the majority of white residents living in Oak Park. Freedom to Thrive Oak Park started this research to understand the current state of community safety in Oak Park. We heard far too many stories from people of color about their negative interactions with the police and decided to organize and educate the community about these issues.

“Oak Park spends more on policing and less on supportive social services than municipalities more than twice its size. This spending does not yield a community where all of its members feel safe and can thrive.”

Our research shows that Oak Park can organize and create policies informed and developed in partnership by those who are most impacted by these policies. The Co-optation by Federal Immigration Enforcement section scored the highest in our analysis. The Welcoming Village Ordinance that informed much of the basis of this policy was written by a coalition of immigrant rights advocates that organized a multi-city and state-wide effort to implement welcoming resolutions and pro-immigrant policies after the 2016 election. The high score received by these policies gives insight into the benefit and need for a public and transparent process for policy creation. If Oak Park is to enact progressive policing reform, it must rescind the use of Lexipol and move towards a participatory, citizen-led model of policy development.

The need for improved oversight is clear in the Independent Oversight evaluation, which scored the lowest of the three policies that we evaluated in this report. Recent appointments to the Citizen Police Oversight Commission (CPOC) give further credence to the need of a completely independent and fully empowered CPOC, so that Oak Park residents have the ability to conduct full and transparent investigations into citizen complaints of police misconduct. Oak Park’s Use of Force general order also needs review, in particular to address the lack of public reporting on any use of force incidents by Oak Park police.

Finally, our budget investigations show a need for a reduction in the amount spent on policing, and an increase in the amount spent on social services such as affordable housing and youth services. Oak Park has the 3rd largest police force per capita in Illinois, with Chicago and Evanston being the first and second largest per capita, respectively.³⁴ Many will point to Oak Park’s vicinity to the Austin neighborhood of Chicago as the reason to keep such a large force.^{35 36 37} But the impact of a large police force, in particular the trauma of increased policing on young people of color,^{38 39 40 41} is something that our elected officials must take into account when voting to increase the resources given to the police department. It is our hope that the publication of this and following reports will serve as a starting point for reimagining public safety in Oak Park, so that everyone in our community has the freedom to thrive.

**To join Freedom to Thrive’s efforts, please sign up here:
<https://freedomtothriveop.com>**



Youth with ROYAL: The Revolutionary Oak Park Youth Action League link arms at Village Hall (photo by Paul Goyette)

Appendix: Methodology

In December of 2019, the Center for Popular Democracy and Local Progress released an analysis of policing policy and budgets in 12 cities across the country, based on the investigatory questions laid out in the [Reform/Transform toolkit](#). As part of this release, researchers with the Center for Popular Democracy developed a methodology for scoring a jurisdiction on three policy metrics: use of force, independent oversight, and co-optation of law enforcement for federal immigration enforcement. The available score categories are: “**on track to a strong policy**,” “**making progress with need for improvement**,” and “**significant need for improvement**.” Achieving local policy that keeps communities safe and thriving is an ever-changing challenge, so there is no perfect score in this methodology; rather there is a call for improvement and continued investigation.

Independent oversight scoring methodology

Freedom to Thrive Oak Park and Local Progress evaluated the jurisdiction based on a full set of policy criteria as developed in the Reform/Transform toolkit. We utilized the [Reform/Transform ranking methodology](#) to assign a score to Oak Park for its independent oversight policy. Because the original tool is lengthy and the questions are numerous, Reform/Transform researchers organized the full list of questions into a smaller number of thematic groupings. This process yielded 14 broad groupings of questions (which encompassed all of the sub-questions from the original, full-length tool). Finally, they developed a ranking system to differentiate jurisdictions’ performance based on how successfully the authorizing legislation and/or other written policies governing their civilian review boards and/or other external oversight agencies fulfill these 14 broad criteria. Because not all questions should be weighted equally (some criteria are more essential to giving a policy teeth than others), the ranking system reflects researchers’ judgements about what components are critical to real accountability based on research and previous conversations with policy experts.

On Track to a Strong Policy

To be placed in the top category, “On Track to a Strong Policy,” a jurisdiction’s civilian review board and/or other external oversight agency must, as authorized through legislation or written policy:

- Conduct investigations independently of the police department
- Have all necessary investigatory powers, including either subpoena power or administrative powers that enable direct and unfettered access and the power to compel witnesses, testimony, and documents
- Have independent disciplinary authority
- Offer public access that allows residents to file complaints through a variety of methods, in multiple languages, and during non-business hours
- Have broad jurisdiction to investigate police department policies and practices and/or issue or recommend policy changes (this authority could be for the civilian review board and/or another external oversight agency, if a jurisdiction had both)

In addition, a jurisdiction in this category must strongly or moderately fulfill at least one of the other criteria.

Making Progress With Need for Improvement

To be placed in the middle category, “Making Progress with Need for Improvement,” a jurisdiction’s civilian review board and/or other external oversight agency must, as authorized through legislation or written policy:

- Conduct investigations independently of the police department
- Have some investigatory powers, such as either subpoena power or administrative powers that enable direct and unfettered access and/or the power to compel witnesses, testimony, and/or documents
- Offer public access that allows residents to file complaints through a variety of methods and during non-business hours

In addition, a jurisdiction in this category must strongly or moderately fulfill at least one other criteria (but does not meet the criteria for “On Track to a Strong Policy”).

Significant Room for Improvement

To be placed in the bottom category, “Significant Room for Improvement,” a jurisdiction’s civilian review board and/or other external oversight agency would fit any of the following:

- Does not conduct investigations independently of the police department
- Does not have investigatory power
- Does not offer public access that allows residents to file complaints through a variety of methods and during non-business hours
- Does not otherwise meet the above criteria for “On Track to a Strong Policy” or “Making Progress with Room for Improvement”

Use of force scoring methodology

Freedom to Thrive Oak Park and Local Progress evaluated the jurisdiction based on a full set of policy criteria as developed in the Reform/Transform toolkit. We utilized the [Reform/Transform ranking methodology](#) to assign a score to Oak Park for its use of force policy. Because the original tool is lengthy and the questions are numerous, Reform/Transform researchers organized the full list of questions into a smaller number of thematic groupings. This process yielded seven broader groupings of questions (which encompassed all of the sub-questions from the original, full-length tool). Finally, they developed a ranking system to differentiate jurisdictions’ performance based on how successfully their use of force policies fulfill these seven broad criteria. Because not all questions should be weighted equally (some criteria are more essential to giving a policy teeth than others), the ranking system reflects researchers’ judgements about what components are critical to real accountability based on research and previous conversations with policy experts.

On Track to a Strong Policy

For a jurisdiction to be placed in the top category, “On Track to a Strong Policy,” the use of force policy must:

- Explicitly express a commitment to preserve lives/protect the sanctity of life
- Establish a use of force continuum that defines types of force or weapons that can be used to respond to different types of resistance
- Put the following limitations on officers: ban chokeholds and strangleholds; require verbal warnings; prohibit from shooting at moving vehicles; and require officers to exhaust all reasonable alternatives before shooting
- Explicitly state that officers must, when possible, intervene to stop the use of excessive force
- In addition, a jurisdiction in this category must have strong or moderately strong public reporting requirements.

Making Progress With Need for Improvement

For a jurisdiction to be placed in the middle category, “Making Progress with Need for Improvement,” the use of force policy must:

- Explicitly express a commitment to preserve lives/protect the sanctity of life
- Put at least some of the following limitations on officers: ban chokeholds and strangleholds; require verbal warnings; prohibit from shooting at moving vehicles; or require officers to exhaust all reasonable alternatives before shooting

In addition, a jurisdiction in this category must have strong or moderately strong public reporting requirements and must strongly or moderately fulfill at least one of the other seven criteria.

Significant Room for Improvement

To be placed in the bottom category, “Significant Room for Improvement,” a use of force policy:

- Does not explicitly express a commitment to preserve lives/protect the sanctity of life and/or
- Does not otherwise meet the above criteria

An end to the co-optation of local law enforcement for federal immigration enforcement scoring methodology

Freedom to Thrive Oak Park and Local Progress evaluated the jurisdiction based on a full set of policy criteria as developed in the Reform/Transform toolkit. We utilized the [Reform/Transform ranking methodology](#) to assign a score to Oak Park for its policy related to co-optation of local law enforcement for federal immigration enforcement. Because the original tool is lengthy and the questions are numerous, Reform/Transform researchers organized the full list of questions into a smaller number of thematic groupings. This process yielded eight broad groupings of questions (which encompassed all of the sub-questions from the original, full-length tool). They developed a ranking system to differentiate jurisdictions’ performance based on how successfully their policies fulfill these eight broad criteria. Because not all questions should be weighted equally (some criteria are more essential to giving a policy teeth than others), the ranking system reflects researchers’ judgements about what components are critical to real accountability based on research and previous conversations with policy experts.

Please also note that in Oak Park, as in many municipalities, the village does not administer a jail, which are often under the jurisdiction of counties. We have still answered the questions that ask about policies in relation to the jail. Those answers reflect village policies and thus do not reflect county policies governing jail staff. Nevertheless, these questions are still relevant because police departments have the power to detain and often hold a person for some time.

On Track to a Strong Policy

For a jurisdiction to be placed in the top category, “On Track to a Strong Policy,” local law enforcement agencies and/or jails must have policies that require them to do all of the following:

- Refuse to comply with ICE detainer requests
- Refuse to respond to ICE requests for notification of release
- Prohibit immigration authorities from conducting interviews in the jail or require immigration authorities to clearly identify themselves to those they interview
- Have policies in place to guide local law enforcement agencies and officers in responding to requests for information from federal immigration authorities
- Does not have a 287(g) agreement, an intergovernmental service agreement, or any other agreement or contract with federal immigration authorities
- Prohibit officers from asking/collecting immigration status

Making Progress With Need for Improvement

For a jurisdiction to be placed in the middle category, “Making Progress with Need for Improvement,” local law enforcement agencies and/or jails must have policies that require them to do all of the following:

- Refuse to comply with ICE detainer requests
- Refuse to respond to ICE requests for notification of release

- Prohibit officers from asking/collecting immigration status
- Do not otherwise meet the criteria for “On Track to a Strong Policy”

Significant Room for Improvement

To be placed in the bottom category, “Significant Room for Improvement,” local law enforcement agencies and/or jails does not have one or both of the following policies:

- Refusing to comply with ICE detainer requests and/or
- Refusing to respond to ICE requests for notification of release

Budget priorities methodology

Oak Park has six taxing bodies that provide services to our community. There are two school districts in Oak Park: District 97 (Kindergarten - 8th grade) and District 200 (Oak Park River Forest High School, where governance is shared with the neighboring village of River Forest). These school districts provide education and supportive services to their students’ families. The Oak Park Library and the Park District of Oak Park are two additional entities that provide facilities and programs to the community. The Oak Park Township provides a range of services to the community, most notably senior services, mental health programs, and youth services. The Village of Oak Park is the governing body for the Village. It is the only entity which funds the local Fire and Police departments. It is also responsible for maintaining infrastructure and providing water/sewer/trash services to the Village. Because the Village of Oak Park is solely responsible for funding the Police Department, our researchers focused on analyzing the budget for the Village of Oak Park.

Freedom to Thrive Oak Park and Local Progress evaluated the Oak Park Village’s budget based on a full set of criteria as developed in the [Reform/Transform toolkit](#). We assessed expenditures on policing and corrections compared the village’s resources and programs that truly keep communities safe: jobs programs, mental health services, and youth development programs. We examined both the total operating budget and the general fund budget because each provides useful information: the general fund is the most discretionary part of a jurisdiction’s budget, over which local elected officials have most influence; the total budget shows all sources of funding. Not included are additional programs which Oak Park supports through federal Community Development Block Grants.

When assessing spending on police and corrections, jobs programs, mental health services, and youth development programs, the Reform/Transform toolkit calls on researchers to report the total department budgets that house these programs and services--not specific programs within department budgets or individual line item expenditures. In most cases, jobs programs, mental health services, and youth development programs are only one small part of the work of a department. (For example, many cities’ youth programming is found within their Parks Department.) Because there are many inconsistencies between how cities report information at the programmatic level, Reform/Transform researchers found the departmental analysis to be the most straightforward and consistent approach. While the actual funding directed towards jobs, mental health, and youth development programs reflect only a small portion of total departmental spending, the department-level analysis still paints an overall picture of the way localities prioritize spending.

We used the jurisdictions’ fiscal year 2019 budgets in our analyses. Budgets for ten years ago are fiscal year 2009 actual expenditures, unless otherwise noted.

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