The Chicago Police Department (CPD) welcomes the opportunity to comment on the recently-published RAND review of the first phase of our National Institute of Justice (NIJ) grant-funded Predictive Policing project partnership with the Illinois Institute of Technology (IIT). This partnership has developed one of the first subject-based prediction models in the United States. Until now, predictive efforts have largely focused on places — identifying specific geographies most likely to experience future crime - to help law enforcement make informed place-based strategy and resource deployment decisions. However, through this NIJ grant, CPD and IIT began to think about prediction in a different way, one that would identify the specific risk of individual subjects to be violent crime victims or perpetrators to help law enforcement design, implement and evaluate person-based public safety interventions.

**SUMMARY**

1. The report does not evaluate the prediction model itself, as the study indicates. Instead, it focuses on the impact of the intervention strategy.
2. RAND evaluated a very early version of the Department’s Custom Notification intervention strategy, which has since evolved greatly and has been fully integrated with the Department’s management accountability process (CompStat).
3. The prediction model discussed in the report is the very early, initial model (Version 1), developed in August, 2012. We are now using Version 5, which is significantly improved.
4. The model never uses race, gender, ethnicity, or geography. It is based on crime data.
5. The SSL model informs a range of intervention strategies, and is a foundation for future intervention ideas that involve a range of criminal justice stakeholders.
CENTRAL POINTS

1. The paper does not evaluate the prediction model itself. As the paper states on page 9 “This study does not evaluate the validity or reliability of the model, but rather focuses on the impact of the predictions being used in practice.” This article does, however, review our earliest person-based predictive model, Strategic Subjects List (SSL) Version 1 (deployed in August 2012). Since that time, the SSL model has undergone extensive refinement and repeated iterations. We are currently using SSL Version 5, which is more than 3 times as accurate as the version reviewed by RAND (Version 6 is in simultaneous development). Regarding this prediction model, repeated quantitative evaluations have shown that the model produces very accurate findings (i.e. identification of individuals who are at very high risk for involvement in violence).

2. RAND only evaluated the first few months of the program, and the findings are no longer relevant. RAND evaluated CPD’s earliest use of a "Customs Notification" intervention strategy, which has since evolved significantly in scope and substance (e.g. Custom Notifications are now used in every Chicago police district, and Customs metrics have become fully integrated within our CompStat accountability framework and weekly Compstat meetings). Custom Notifications are only one way our SSL model is used as part of the overall violence reduction effort employed by the Department and our criminal justice and social service partners.

3. The prediction model described in the paper is nothing like the one in current use. The paper describes SSL Version 1, which was based on an individual's criminal associations to homicide victims, inspired by an observation by Dr. Andrew Papachristos (Yale University) that criminal cooperation with violent individuals puts a person at increased risk for violence. Since then, IIT’s research has shown that much more important determinants of risk are an individual’s own recent involvements in crime, such as the number of times an individual has recently been shot or violently attacked, and the number of times the individual has recently been arrested for violent offenses and weapons charges. SSL Version 5, in current use, is based on these findings.

4. It is important to note that no version of the SSL model has used personal attributes of an individual that would be discriminatory, such as race, gender, or ethnicity. The model also does not use information that might indirectly reveal those personal attributes; thus, the model does not make use of the neighborhood in which an individual lives, or which gang he or she is a member of. The model also uses nothing beyond standard crime records that might violate an individual's privacy rights.

5. CPD’s Custom Notifications Program. CPD’s SSL is prepared by human analysts to identify a set of individuals deemed to be at very high risk of involvement in violence, either as a perpetrator or victim. The SSL informs numerous CPD strategies, including a Custom Notifications program in which CPD works with community members and social service groups to contact and personally visit those individuals and their "influentials" (close family and friends) who are judged to be at the highest risk for retaliatory violence and/or additional victimization in the near future. These "home visits" are attended by police, community members, and services reps who communicate several messages to the individual of concern: that he is at very high risk of being shot and injured or killed, or being the shooter and spending his life behind bars; that his community needs him and wants to support him; and that he can access social services that will help him become a responsible member of his community.

CONCLUSION

CPD accepts the article’s conclusion that the efficacy of the Custom Notifications program could not be demonstrated during its first few months of implementation, but stresses that the article does not support a conclusion that the tools and predictive models to support the strategy are somehow deficient. As the paper states, RAND did not attempt to evaluate the prediction model. As reviewed in this article, CPD’s Custom Notifications program was just one early strategy based on Version 1 of the SSL predictive model. Now on version 5 (and soon version 6), the SSL model is improved and the Department’s processes for utilizing the model are more mature. Numerous criminologists,
sociologists, and police strategists have asserted that any viable strategy to reduce violence requires an awareness of the individuals most likely to be involved in violence and the social connections between them, and agencies throughout the United States have expressed interest in the SSL concept. CPD and IIT have conducted numerous SSL demonstrations around the country, and CPD has hosted site visits for multiple police departments representing a diverse cross-section of local and state jurisdictions.

The Chicago Police Department continues its partnership with the Illinois Institute of Technology through a Smart Policing grant funded by the U.S. Department of Justice Bureau of Justice Assistance (BJA) to allow further refinement of the model. As the model continues to mature, so will the maturity of our intervention strategies. In fact, the SSL platform forms a foundation that can inform a variety of intervention strategies in the future.

The Department welcomes our continued partnership with RAND, who we invited to be our evaluation partner for the Smart Policing grant-funded improvements to the efforts now in place and in continued development. The findings of this recent RAND paper are now outdated, but we are currently working with RAND to evaluate current and future efforts, and we will be seeking their inputs to help improve the success of this innovative new approach to curbing gun violence.

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