

Independent Monitoring Report 13

Data Collection, Analysis & Management Compliance Assessments by Paragraph

Specific compliance assessments, by paragraph, for the Data Collection, Analysis & Management section are available here. This includes paragraphs where the City gained or lost compliance in the thirteenth reporting period, as well as paragraphs with significant developments toward or away from compliance. A fuller description of the history of compliance efforts, methodologies, compliance determinations for each original monitorable paragraphs in the Data Collection, Analysis & Management section is available in *Comprehensive Assessment Part I* (which included *Independent Monitoring Report 8*): <https://cpdmonitoringteam.com/imr-8-1/>.

Data Collection, Analysis & Management: ¶575

575. CPD recently established a Force Review Unit (“FRU”) and tasked the FRU with certain responsibilities described in the preceding paragraph. CPD will ensure that the FRU or any other unit tasked with these responsibilities has sufficient resources to perform them. CPD will ensure that the FRU or any other unit tasked with these responsibilities is staffed with CPD members, whether sworn or civilian, with sufficient experience, rank, knowledge, and expertise to: effectively analyze and assess CPD’s use of force practices and related reporting and review procedures; conduct trend analysis based on use of force data; identify tactical, equipment, training, or policy concerns based on analysis of use of force incidents and data; and develop recommendations regarding modifications to tactics, equipment, training, or policy as necessary to address identified practices or trends relating to the use of force.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *Not In Compliance*

Secondary: *Not In Compliance*

Full: *Not In Compliance*

In the thirteenth reporting period, the City and the CPD did not achieve any level of compliance with the requirements of ¶575.

The City and the CPD achieved Preliminary and Secondary compliance with ¶575 in the fourth reporting period, but lost compliance in the sixth reporting period due to inadequate staffing, which remained a concern in the thirteenth reporting period.

The process of ensuring “sufficient resources to perform” the tasks TRED is required to perform is ongoing, and we cannot yet say that TRED currently has those resources in place (certainly not on a permanent basis). Coupled with TRED’s current backlog, the need for a stable staffing pool prevents the CPD from achieving Preliminary compliance with this paragraph. While we appreciate the efforts the CPD has undertaken to relieve the backlog (pushing some reviews to district supervisors, for example), to achieve Preliminary compliance, the CPD needs a permanent solution to reducing its TRED backlog including implementation and evidence of further reductions in the backlog.

Paragraph 575 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
None

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
Secondary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
Secondary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
None

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
None

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
None

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
None

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
None

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
None

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
None

Data Collection, Analysis & Management: ¶580

580. The FRB will review each incident within its purview promptly, which will in no event be more than 96 hours after the incident occurs. Within 30 days after its review of an incident, the FRB will issue recommendations, if appropriate, to the Superintendent regarding any need for additional training or modifications to policies, tactics, equipment, or Department practices. Upon review and approval by the Superintendent, or his or her designee, the FRB will assign each approved recommendation to a specific CPD command staff member for implementation. CPD will promptly implement each approved recommendation.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary:	<i>In Compliance</i> (THIRD REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (SEVENTH REPORTING PERIOD)
Full:	<i>Not In Compliance</i>

In the thirteenth reporting period, the City and the CPD did not achieve Full compliance with ¶580.

To assess Full compliance, the IMT reviewed the entities' data collection and evaluated whether the Force Review Board (FRB) consistently engaged in a critical review of incidents and made a decision-point analysis per the requirements of ¶580.

During the thirteenth reporting period, the CPD maintained General Order G03-02-08, *Department Review of Use of Force*, which memorializes the role of the FRB in reviewing Level 3 uses of force and reportable uses of force by a CPD command staff member. As the FRB remains in policy, the CPD has maintained Preliminary compliance with ¶580. Additionally, the CPD continues to use Standard Operating Procedure (SOP) 2020-03, *Force Review Board*, which details the requisite FRB processes and maintains Secondary compliance.

However, we continue to observe inconsistent timing and execution of FRBs, and some do not sufficiently evaluate opportunities for operational improvement. As we have noted in our past reports, FRB reviews should be designed to look at each decision during an event to understand how they contributed to the outcome and whether, from an operational perspective, there is a need for additional training or opportunities for improvement to policy, tactics, equipment, or practices. Yet the FRB meetings we have observed over the past few reporting periods continue to be summary reviews of the force event without the nuance required by SOP 2020-03. Additionally, there is rarely any substantive discussion among the CPD command staff members who are required to participate in the FRB.

Moreover, the CPD is not consistently meeting the 96-hour (4 day) requirement of this paragraph. During this reporting period, the length of time between the use-

of-force incident and the FRB meeting ranged between two and 14 days. While we recommended in our comprehensive assessment that the Parties consider revising this 96-hour requirement to, among other things, ensure meaningful review of each incident, the Parties have not revised this requirement. We therefore conclude that FRB meetings, as they are presently conducted, continue to fall short of the requirements of ¶1580.

The IMT provided some ideas for improvement during this reporting period and continues to be available for consultation with the CPD as to how FRB operations should be enhanced.

Paragraph 580 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: None	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Preliminary
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Preliminary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Preliminary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary		

Data Collection, Analysis & Management: ¶581

581. Beginning within 180 days of the Effective Date, CPD will publish on at least a monthly basis aggregated and incident-level data, excluding personal identifying information (e.g., name, address, contact information), regarding reportable use of force incidents via a publicly accessible, web-based data platform.

Compliance Progress (Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance (NINTH REPORTING PERIOD)*

Secondary: *In Compliance (NINTH REPORTING PERIOD)*

Full: *Not In Compliance*

In the thirteenth reporting period, the City and the CPD did not achieve Full compliance with the requirements of ¶581.

During the thirteenth reporting period, the CPD maintained its public-facing, web-based *Use of Force Dashboard*, which updates data on a monthly basis. The CPD has maintained the ability to download the underlying data in the dashboard, allowing for review of the data at the incident-level, as well as at the individual officer/community member level.

During this reporting period, the CPD maintained the reliability of the Use of Force Dashboard data through a comprehensive audit approach of use-of-force events that was completed in the eleventh reporting period. However, during this reporting period, the IMT was unable to verify that all community comments to the dashboard were properly handled by the CPD in accordance with Tactical Review and Evaluation Division (TRED) procedures.

Moving forward, the CPD must provide data for the IMT to monitor that community comments are appropriately and timely addressed. Additionally, the IMT will also continue to monitor the CPD's ability to demonstrate the reliability of the Use of Force Dashboard data.

Paragraph 581 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
None

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
None

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
Preliminary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Preliminary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Preliminary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Secondary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
Secondary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

Data Collection, Analysis & Management: ¶582

582. *The publicly accessible, web-based data platform will enable visitors to:*

- a. identify where reportable uses of force occur through interactive maps depicting incident frequencies at a citywide, district, neighborhood, and ward level;*
- b. identify the frequency, in the aggregate and by type, of reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations;* and
- c. review aggregate demographic information about the race, ethnicity, age, and gender of persons subjected to reportable uses of force at the citywide, district, neighborhood, and ward level through graphs, charts, and other data visualizations.*

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary:	<i>In Compliance</i> (NINTH REPORTING PERIOD)
Secondary:	<i>In Compliance</i> (NINTH REPORTING PERIOD)
Full:	<i>Not In Compliance</i>

In the thirteenth reporting period, the City and the CPD did not achieve Full compliance with the requirements of ¶582.

During the thirteenth reporting period, the CPD maintained its *Use of Force Dashboard*, which is updated monthly. The elements of ¶582 continue to be incorporated into the aggregate-level data presented through the dashboard’s “graphs, charts, and other data visualizations,” as required.

During this reporting period, the CPD maintained the reliability of the Use of Force Dashboard data through a comprehensive audit approach of use-of-force events that was completed in the eleventh reporting period.

However, during this reporting period, the IMT was again unable to verify that all community comments to the dashboard were properly handled by the CPD in accordance with Tactical Review and Evaluation Division (TRED) procedures. Moving forward, the CPD must provide data to the IMT to demonstrate that community comments are appropriately and timely addressed. Additionally, the IMT will also continue to monitor the CPD’s ability to demonstrate the reliability of the *Use of Force Dashboard* data.

Paragraph 582 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
None

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
Preliminary

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
Preliminary

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
Preliminary

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
Preliminary

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
Secondary

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
Preliminary

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
Secondary

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
Secondary

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
Secondary

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
Secondary

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Secondary

Data Collection, Analysis & Management: ¶605

605. The City will ensure CPD has adequate funding to develop, implement, and maintain the EIS and, if necessary, the updated PRS, including ongoing hardware and support requirements and officer support services.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance (NEW)*

Secondary: *Not In Compliance*

Full: *Not In Compliance*

In the thirteenth reporting period, the City and the CPD achieved Preliminary compliance with the requirements of ¶605.

During the thirteenth reporting period, the City and the CPD continued developing the early intervention system (EIS) through their contract with Benchmark Analytics. The IMT reviewed the signed Benchmark Analytics contract and noted the funding level therein, which represents the City’s commitment of “adequate funding” to develop the system as this paragraph requires. Moreover, the IMT reviewed bills paid to Benchmark for its work on the EIS. In addition, the CPD’s data needs assessment (¶606) includes the CPD’s needs for the EIS.

Finally, the IMT has tracked and reviewed the development work that is underway for the EIS, which is called “First Sign,” being performed by Benchmark Analytics. The CPD provided live demonstrations of the functionality of First Sign, and the IMT has also reviewed screen shots of the First Sign system, which display relevant variables and clear user interfaces.

To achieve Secondary compliance, the CPD must continue to demonstrate that the City has provided necessary funding and the CPD must design an iterative process to reassess funding needs for the EIS on a regular basis.

Paragraph 605 Compliance Progress History

FIRST REPORTING PERIOD
MARCH 1, 2019 – AUGUST 31, 2019

COMPLIANCE PROGRESS:
Not Applicable

SECOND REPORTING PERIOD
SEPTEMBER 1, 2019 – FEBRUARY 29, 2020

COMPLIANCE PROGRESS:
Not Applicable

THIRD REPORTING PERIOD
MARCH 1, 2020 – DECEMBER 31, 2020

COMPLIANCE PROGRESS:
Not Applicable

FOURTH REPORTING PERIOD
JANUARY 1, 2021 – JUNE 30, 2021

COMPLIANCE PROGRESS:
Not Applicable

FIFTH REPORTING PERIOD
JULY 1, 2021 – DECEMBER 31, 2021

COMPLIANCE PROGRESS:
Not Applicable

SIXTH REPORTING PERIOD
JANUARY 1, 2022 – JUNE 30, 2022

COMPLIANCE PROGRESS:
None

SEVENTH REPORTING PERIOD
JULY 1, 2022 – DECEMBER 31, 2022

COMPLIANCE PROGRESS:
None

EIGHTH REPORTING PERIOD
JANUARY 1, 2023 – JUNE 30, 2023

COMPLIANCE PROGRESS:
None

NINTH REPORTING PERIOD
JULY 1, 2023 – DECEMBER 31, 2023

COMPLIANCE PROGRESS:
None

TENTH REPORTING PERIOD
JANUARY 1, 2024 – JUNE 30, 2024

COMPLIANCE PROGRESS:
None

ELEVENTH REPORTING PERIOD
JULY 1, 2024 – DECEMBER 31, 2024

COMPLIANCE PROGRESS:
None

TWELFTH REPORTING PERIOD
JANUARY 1, 2025 – JUNE 30, 2025

COMPLIANCE PROGRESS:
None

THIRTEENTH REPORTING PERIOD
JULY 1, 2025 – DECEMBER 31, 2025

COMPLIANCE PROGRESS:
Preliminary

Data Collection, Analysis & Management: ¶607

607. Within 90 days of completion of the assessment described in the preceding paragraph, CPD will develop a plan, including a timeline for implementation, to prioritize and address the needs identified to enhance CPD's information collection mechanisms and data management technology ("Data Systems Plan"). CPD will implement the Data Systems Plan in accordance with the specified timeline for implementation.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary:	In Compliance (ELEVENTH REPORTING PERIOD)
Secondary:	In Compliance (NEW)
Full:	Not Yet Assessed

In the thirteenth reporting period, the City and the CPD achieved Secondary compliance with the requirements of ¶607.

To assess Secondary compliance, the IMT reviewed the CPD's *Data Systems Plan*, which includes implementation timelines as required by ¶607.

At the end of the previous reporting period, the CPD provided an initial draft of the *Data Systems Plan*, which provided some details about the CPD's plans for building and implementing various data systems but lacked sufficient detail regarding specific implementation approaches.

This reporting period, the CPD provided a revised *Data Systems Plan* in response to the IMT's feedback on its initial draft. The revised *Data Systems Plan* contains detailed information regarding data system implementation, including specified timelines and a detailed Appendix that included tabs with areas of opportunity for each ¶606 assessment category; a comprehensive list of data required by the Consent Decree with corresponding paragraph numbers and references to relevant data systems; and a detailed applications list. The revised *Data Systems Plan* and Appendix sufficiently outline the CPD's purpose, mission, and responsibilities for its data systems and will be useful in guiding the CPD's implementation of the *Data Systems Plan*. With this, the CPD achieved Secondary compliance.

The IMT understands that the City and the CPD are in various stages of preparations for implementation, including that systems being developed by the CPD's vendor *Benchmark Analytics* are underway and that the procurement process for a new records management system (RMS) is also underway. A new RMS is a critical resolution to many of the data system needs identified in the ¶606 assessment.

The IMT will assess Full compliance based on the CPD's implementation of the *Data Systems Plan*. We look forward to our continued observations of the CPD's Information Systems Development Group (ISDG) meetings and note that the ISDG is responsible for "ensuring implementation of the Data Systems Plan" per ¶608.

Paragraph 607 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: None	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: None	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: None
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: None	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: None	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: None
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: None	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Preliminary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Preliminary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary		

Data Collection, Analysis & Management: ¶608

608. CPD will continue to maintain an Information Systems Development Group (“ISDG”). The ISDG will continue to be chaired by the Chief of the Bureau of Technical Services or other high-ranking member of CPD’s command staff. The ISDG will also include, in some capacity, personnel from various units of the Department that are responsible for overseeing patrol field operations; conducting criminal investigation and processing juvenile offenders; initiating and conducting investigations of organized crime; overseeing the administrative aspects of CPD; managing data, technology, and information systems; coordinating and exercising supervision over disciplinary matters; administering training; providing legal advice; developing and publishing department policies and procedures; and overseeing and coordinating CPD’s budget and fiscal responsibilities. The ISDG will be responsible for: a. ensuring implementation of the Data Systems Plan; b. ensuring CPD’s information collection mechanisms and data management technologies are in the best long-term interests of the Department for improving operations and management consistent with the terms of this Agreement; and c. recommending strategies to promote the development, sharing, and reporting of relevant information to the Superintendent, the public, the FRB, COPA, BIA, and OIG.

Compliance Progress

(Reporting Period: July 1, 2025, through December 31, 2025)

Preliminary: *In Compliance (ELEVENTH REPORTING PERIOD)*

Secondary: *In Compliance (FIFTH REPORTING PERIOD)*

Full: *Not Yet Assessed*

In the thirteenth reporting period, the City and CPD did not achieve Full compliance with the requirements of ¶608.

The CPD continues to maintain an Information Systems Development Group (ISDG), which is chaired by the Managing Deputy Director of Information Technology and meets quarterly. The IMT has continued to observe the ISDG’s quarterly meetings, which include personnel from various units of the CPD as outlined by ¶608.

In previous reporting periods, the CPD provided the IMT with ISDG meeting notes, agendas, and minutes. However, the CPD did not provide this documentation in the thirteenth reporting period. To maintain Secondary compliance, the CPD should continue to provide detailed documentation from ISDG meetings (*i.e.*, meeting notes and with lists of attendees, agendas, and meeting minutes) to demonstrate that the requirements of this paragraph are met.

To achieve Full compliance, the CPD must demonstrate that the ISDG is fulfilling each of its responsibilities outlined by this paragraph. Per ¶608, the ISDG is responsible for “a. ensuring implementation of the Data Systems Plan; b. ensuring CPD’s information collection mechanisms and data management technologies are in the best long-term interests of the Department for improving operations and

management consistent with the [Consent Decree]; and c. recommending strategies to promote the development, sharing, and reporting of relevant information to the Superintendent, the public, the FRB, COPA, BIA, and OIG.”

During a site visit in the thirteenth reporting period, the IMT and the CPD had a productive discussion about how to make the quarterly ISDG meetings more meaningful and increase participation by group members. We also discussed ¶1608’s requirement that the ISDG “ensur[e] implementation of the Data Systems Plan.” Now that the CPD has developed the *Data Systems Plan* required by ¶1607, the IMT will look for the ISDG to be involved in the *Plan’s* implementation.

Paragraph 608 Compliance Progress History

FIRST REPORTING PERIOD MARCH 1, 2019 – AUGUST 31, 2019 COMPLIANCE PROGRESS: Not Applicable	SECOND REPORTING PERIOD SEPTEMBER 1, 2019 – FEBRUARY 29, 2020 COMPLIANCE PROGRESS: Not Applicable	THIRD REPORTING PERIOD MARCH 1, 2020 – DECEMBER 31, 2020 COMPLIANCE PROGRESS: Status Update
FOURTH REPORTING PERIOD JANUARY 1, 2021 – JUNE 30, 2021 COMPLIANCE PROGRESS: Preliminary	FIFTH REPORTING PERIOD JULY 1, 2021 – DECEMBER 31, 2021 COMPLIANCE PROGRESS: Secondary	SIXTH REPORTING PERIOD JANUARY 1, 2022 – JUNE 30, 2022 COMPLIANCE PROGRESS: Secondary
SEVENTH REPORTING PERIOD JULY 1, 2022 – DECEMBER 31, 2022 COMPLIANCE PROGRESS: Secondary	EIGHTH REPORTING PERIOD JANUARY 1, 2023 – JUNE 30, 2023 COMPLIANCE PROGRESS: Secondary	NINTH REPORTING PERIOD JULY 1, 2023 – DECEMBER 31, 2023 COMPLIANCE PROGRESS: Secondary
TENTH REPORTING PERIOD JANUARY 1, 2024 – JUNE 30, 2024 COMPLIANCE PROGRESS: Secondary	ELEVENTH REPORTING PERIOD JULY 1, 2024 – DECEMBER 31, 2024 COMPLIANCE PROGRESS: Secondary	TWELFTH REPORTING PERIOD JANUARY 1, 2025 – JUNE 30, 2025 COMPLIANCE PROGRESS: Secondary
THIRTEENTH REPORTING PERIOD JULY 1, 2025 – DECEMBER 31, 2025 COMPLIANCE PROGRESS: Secondary		