

June 2026



Executive Summary for the Fourteenth Report of the Federal Monitor, Covering the Period from October 2025 through March 2026

This is the fourteenth Chief Monitor's Report (CMR-14) outlining the compliance levels of the Commonwealth of Puerto Rico in relation to the Consent Decree entered between the United States and the Commonwealth of Puerto Rico. This report provides the fourteenth assessment following the four-year capacity building period established by the Consent Decree that ran from June 2014 to October 2018 and covers the period from October 2025 through March 2026.

During the reporting period, the Commonwealth's achievements towards partial and/or substantial compliance with many of the paragraphs remained relatively the same as the last reporting period. Many of the paragraphs remain in deferment due to the Commonwealth's work on implementing the new Axon Records Management System (RMS) and the modules developed by Benchmark Analytics, the Commonwealth's contractor. Issues in the documentation and tracking of the 2025 in-service training have regressed the Commonwealth's achievements with the various training targets and in some cases overall paragraph compliance ratings. PRP's completion of the 2025 training was extended through March 31, 2026; however, training records produced after that date demonstrated challenges with tracking the training conducted both in person and virtually. These challenges largely appear to be related to SAEA's ability to track the recording of the training at each of the area commands and manually update its training records within the Police Training Management System (PTMS). The Monitor's Office hopes that implementation of Benchmark Analytics, the Commonwealth's contractor, and its related training module addresses these challenges in the near future.

As noted in previous CMRs and demonstrated by the challenges with in-service training, the Commonwealth's continued progress continues to hinge on its ability to successfully implement a new RMS and other technological systems targeted at improving its record management, dispatch of services, training records, supervision, data analytics, and investigatory processes. Delays in the contract, procurement, and implementation of these systems in the last and current reporting periods have extended timelines, notably affecting the Commonwealth's compliance with many paragraphs.

As noted above, when examining the total paragraphs assessed in this CMR (N=179) in comparison to the previous CMR in which these same sections and paragraphs were assessed (CMR-12; N=179), the Monitor's Office notes that the Commonwealth has maintained compliance during this reporting period. For example, 86 paragraphs were rated as partially compliant and 10 paragraphs were rated not compliant during this reporting period, in comparison to 84 paragraphs rated as partially compliant and 8 as not complaint in CMR-12. Further, when reviewed comprehensively, almost 31% (N=56) of the

June 2026

paragraphs meet either substantial or full compliance in CMR-14 in comparison to 34% (N=60) in CMR-12.

In examining compliance more comprehensively across all 212 monitorable paragraphs in the Agreement, we find that sustained levels of compliance. Full compliance improved by 16 paragraphs, substantial compliance decreased by 14 paragraphs, partial compliance decreased by 1 paragraph, and non-compliance decreased by 1 paragraph from CMRs 11 and 12 to CMRs 13 and 14.¹

Number of Paragraphs by Compliance Rating – Current vs. Previous
Number of monitorable paragraphs in the Agreement: 212

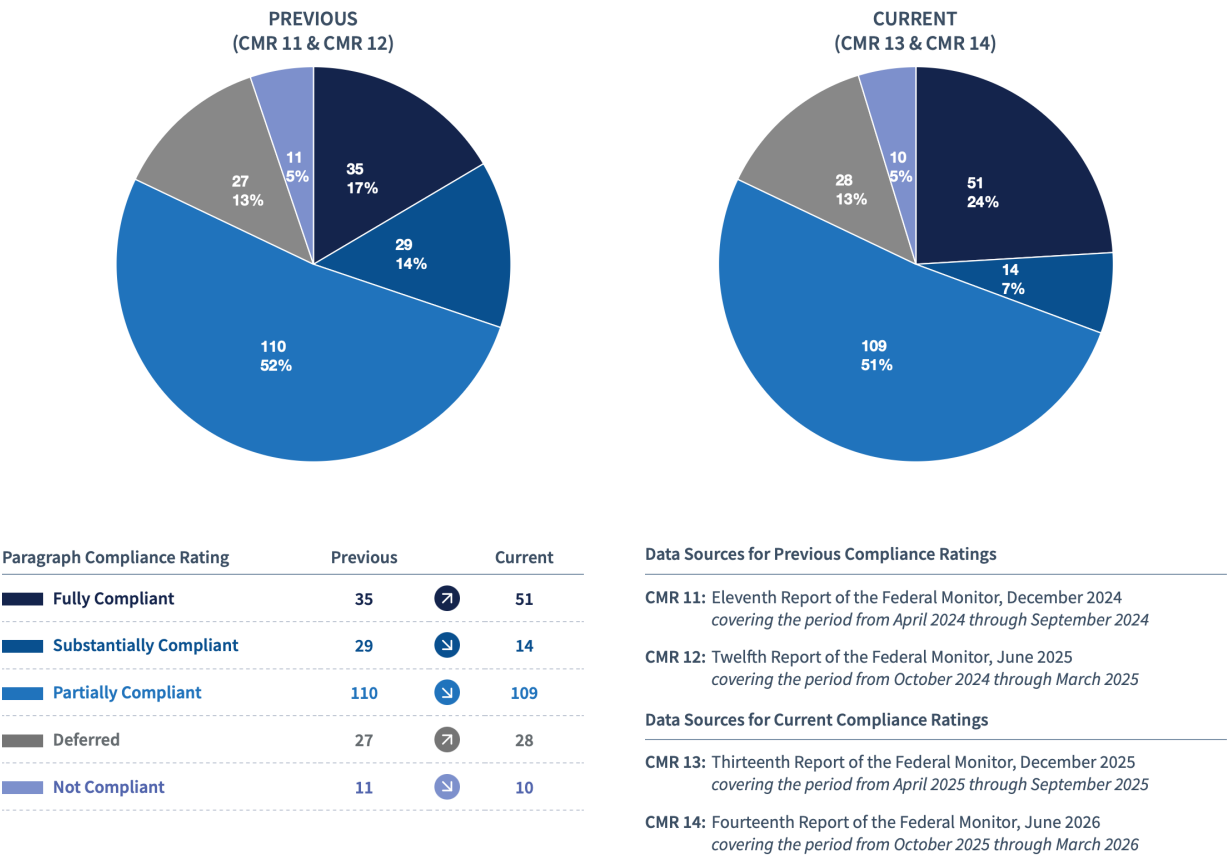


Figure 1. Rate of Compliance Over Time

Monitoring Activities During CMR-14

Over the past six months the Monitor’s Office conducted five site visits to PRP headquarters as well as various regions of the island including Carolina, Caguas, and Fajardo. At each of these field visits the Monitor’s Office visited the area command, district(s) within each area, Highway Patrol Units, and other units. At each location the Monitor’s Office met with executive command and PRP personnel leading

¹ CMRs are produced every 6 months and when combined (i.e., CMR-9 and CMR-10) provide a comprehensive review of compliance for all 212 monitorable paragraphs in the Agreement.

June 2026

and/or involved in various units such as Centro de Mando, Radio Control, Community Interaction Councils (CICs), Community Relations, and use of force (UOF).

These field visits continue to provide valuable opportunities for the Monitor's Office to hear directly from supervisors and officers on the front line, interact with community members, observe operations, receive system demonstrations, and validate the 10,000 policies, documents, certifications, audio recordings, training materials, and case files and reports provided for review during the reporting period. While on site, team members also participated in various system demonstrations on various systems including the Vehicle Interventions Dashboard and Reform STAT.

During the reporting period, the Monitor's Office reviewed 9 policies, forms (PPRs), protocols, and training materials under Paragraph 229 of the Agreement, including GO 649 (Protocolo Pruebas de Integridad), GO 501 (Reclutamiento Aspirante a Cadete), GO 101 (Estructura Organizacional de la Policía de Puerto Rico), and GO 407 (Sistema de Intervención Temprana – EIS) among others. Training materials reviewed also include the 2026 Training Plan and the 2026 in-service training records.

The Monitor's Office also observed community engagement events hosted by PRP and the CICs. Notably, the Monitor's Office conducted a community townhall meeting in Arecibo in March 2026 as part of its efforts to host meetings for the community each quarter. This meeting was largely positive and was attended by over 100 representatives from the community and PRP.

During this reporting period, the Monitor's Office participated in a February 2026 status conference focused on updates related to the CMR-13 report, the status of compliance plans that have been filled with the court, the IT Corrective Action Plan (CAP), updates on the Commonwealth's Reform funding levels and fiscal year 2025-2026 spending, and an update on PRP's 2026 Training Plan.

Looking Forward to CMR-15

The Monitor's Office remains optimistic about the Commonwealth's continued efforts to move compliance forward. Much of what remains to achieve partial and/or substantial compliance is going to be reliant on the Commonwealth's continued work in implementing the various tasks and initiatives within its implementation plans, in sustaining its pre-service training program, addressing issues in the tracking and reporting process of in-service training, implementation of an RMS and Early Intervention System (EIS), and improved data analysis processes. As noted previously, it is imperative that the Commonwealth address its challenges with the reporting and tracking of its in-service training records. Challenges with the tracking of training conducted at the area commands and SAEA's ability to incorporate the training reports from the field into its current PTMS system have caused regressions in the Commonwealth's ability to demonstrate continued progress in conducting its annual in-service training. These challenges must be addressed in order for progress to be documented in future reporting periods. Further, PRP must begin conducting its 2026 in-service training and complete such training by end of December 2026 in order to demonstrate compliance not only with its Training section but also with the various paragraphs that have annual training requirements.

As it does during all reporting periods, the Monitor's Office will continue to review documents produced by PRP and the Commonwealth in demonstration of compliance, conduct additional field visits, observe

June 2026

related training sessions, observe PRP's community engagement efforts, and conduct interviews with both PRP personnel and community stakeholders. Further, the Monitor's Office will continue to conduct additional Townhall Community Meetings across the island to share the Reform status and gather input directly from the broader Puerto Rican Community.

Summary of Compliance by Section

The following summary provides an overview of the Monitor's Office's compliance assessment for each area of the Agreement.

1. Use of Force

PRP continues to adhere to its Provisional UOF Plan, which has consistently yielded accurate department-wide UOF statistics. Updates to the plan are anticipated with the introduction of PRP's new RMS. The Commonwealth's contractor, AH Datalytics, remains instrumental in developing, maintaining, and enhancing various UOF-related dashboards. These tools allow the Reform Unit to thoroughly assess procedural and documentary steps taken during force reporting in the field and assist supervisors in managing workflow and ensuring compliance. Additionally, new dashboards are now accurately tracking the transport of civilians by PRP personnel after a UOF incident, documenting time and starting and arrival mileage.

During this reporting period, PRP reported 837 UOF instances across 377 incidents. Comparative analysis is conducted against prior annual data, including total force applications and incident counts, with an evaluation of the nature of force used. A cross-check performed by the Monitor's Office confirmed both the accuracy and comprehensiveness of PRP's Global Compliance Use of Force Statistics Dashboard. The Monitor's Office noted ongoing progress in timely preparation and submission of UOF reports (PPR 605.1), as all 56 reports reviewed were submitted within policy guidelines. Supervisors completed investigations within five business days, further supporting positive compliance ratings.

Training updates indicate that 2,244 out of 2,311 officers from sergeant to colonel (95%) completed REA 601, covering UOF investigation and review. Overall, 95% of PRP officers have finished their training requirements.

Consistency in UOF data influences many elements of this section. Other relevant topics—such as the Force Investigation Unit (FIU), Force Review Boards (FRBs), Crisis Intervention Training (CIT), Special Weapons and Tactics (SWAT), and crowd control procedures—also impact PRP's compliance. Notably, the Monitor's Office observed that FIU completed 100% of cases within the established 60-day timeline, with personnel retention contributing to improved results.

Superintendent Force Review Board (SFRB) evaluations, as reviewed by the Monitor's Office, were found to be objective and timely. The SFRB continues to evaluate FIU investigations within policy timelines.

June 2026

Additionally, it now operates from dedicated facilities with administrative support for case preparation and meeting coordination.

Coverage of CIT-trained officers extends across all 13 area commands; PRP now employs 294 CIT-trained officers, 267 of whom are assigned to patrol/CIT functions (91%). The Lieutenant leading CIT expansion possesses relevant expertise, including a doctoral degree.

The Commonwealth has achieved progress across numerous UOF paragraphs, largely due to its collaboration with AH Datalytics, the Commonwealth's contractor, whose dashboards aid compliance monitoring. Expansion of CIT training throughout all commands represents significant advancement. Positive efforts during this reporting period have markedly continued PRP's compliance.

Currently, only six paragraphs (22, 32, 34-35, and 56-57) remain partially compliant, with others fully or substantially compliant.

The Monitor's Office approved PRP's 2026 in-service training plan addressing Crowd Control and Persons in Crisis. Completion of this training would likely elevate four of the remaining paragraphs to substantial compliance; however, PRP has indicated that the necessary training to bring those paragraphs into substantial compliance will not take place until the CMR-15 reporting period. As it relates to CIT, PRP needs provide scenario-based crisis training for dispatchers.

Overall, the Commonwealth's compliance with the 36 paragraphs assessed during this reporting period within UOF reflects some improvement in levels of compliance to what was noted in previous CMRs. In CMR-13, 17% of paragraphs (6 paragraphs) were assessed as partially compliant and 50% (18 paragraphs) were assessed as substantially compliant, in comparison to the current reporting period, where 17% of paragraphs (6 paragraphs) were found to be partially compliant and 17% (6 paragraphs) were found to be substantially compliant. Twenty-four paragraphs (67%) were rated as fully compliant in comparison to twelve (33%) in CMR-13. See figure 2.

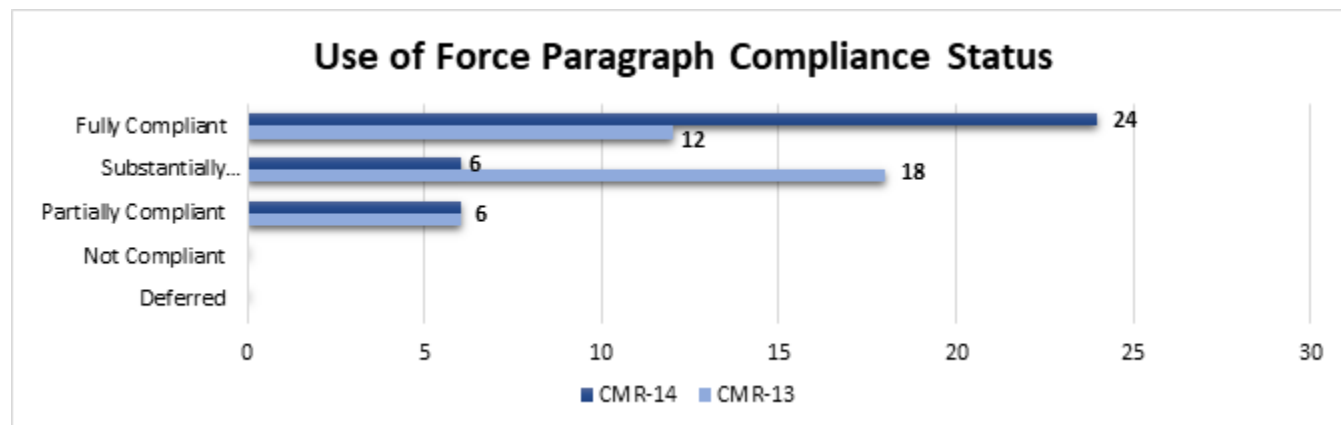


Figure 2. Use of Force: Paragraph Compliance Status

June 2026

2. Searches and Seizures

PRP has adopted straightforward technological solutions that are contributing to improved compliance in several areas, including documenting mileage during arrestee transportation, monitoring when officers access updated or new policies, and maintaining official departmental records. The systems also logs officer participation in training videos.

Reporting period data indicates a healthy percentage of properly documented probable cause (PC) during arrests, though not yet at the level required by the Agreement. The accurate reporting of searches has been an area of high performance and remains in line with departmental policy. Notably, findings reveal significant improvement in the correct completion and inclusion of search consent forms. There has also been progress in the timeliness and quality of supervisory arrest evaluations.

However, compliance continues to be hindered by challenges related to the recording and storage of seized property, along with the lack of an established search warrant tracking system. With regard to completed arrest files, PRP is unfortunately regressing. During this reporting period, almost half of the arrest files were deemed non-compliant, primarily due to missing required arrest forms. It is evident that PRP is not thoroughly inspecting files before submitting them to the Monitor's Office for review.

Due to delays in the full implementation of the RMS and Benchmark Analytics systems, the Commonwealth's contractor, several sections will remain partially compliant or deferred until these platforms are operational. These systems, anticipated to facilitate appropriate data collection and analysis as well as other reporting requirements specified in the Agreement, are projected to enter the pilot phase sometime in 2026.

Overall, the Commonwealth's compliance with the 18 paragraphs assessed during this reporting period within Searches and Seizures reflects similar levels of compliance as noted in previous CMRs. In CMR-12, the last reporting period where these same 18 paragraphs were assessed, 5% of paragraphs (1 paragraph) was found to be not compliant and 67% of paragraphs (12 paragraphs) were found to be partially compliant. In comparison to the current reporting period, 72% of paragraphs (13 paragraphs) were found to be partially compliant. Five paragraphs remain deferred. See figure 3.

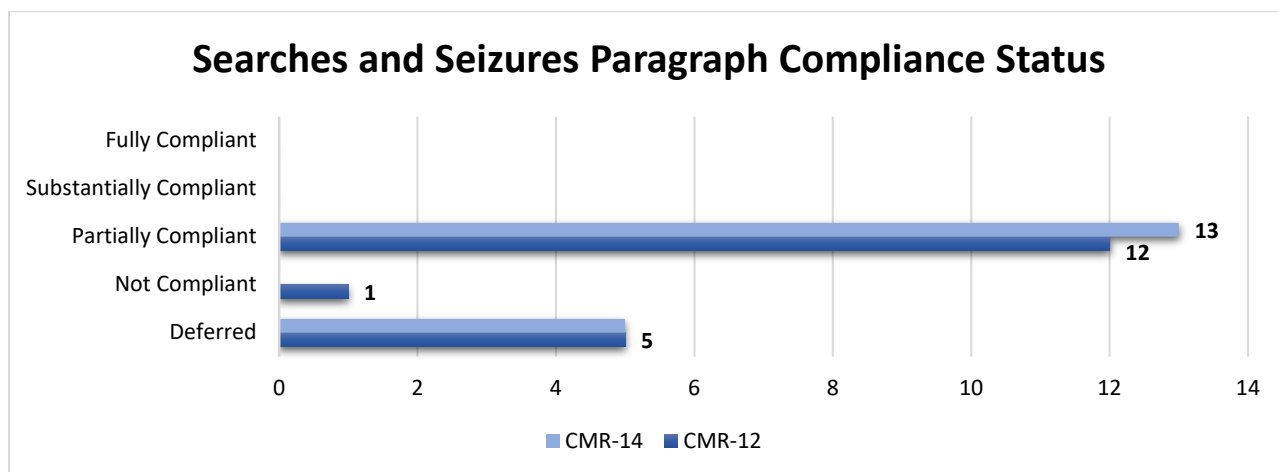


Figure 3. Searches and Seizures: Paragraph Compliance Status

June 2026

3. Equal Protection and Non-Discrimination

During this reporting period, the Monitor's Office evaluated 10 paragraphs - Paragraphs 84 through 86, 88 through 90, 92, 93, 96, and 99. These paragraphs are assessed on a biannual basis for specific targets, which are bolded within each section. As a result, compliance ratings for all paragraphs are carried over from CMR-13. A comprehensive assessment of all related requirements will be conducted in the next CMR. The current review primarily focuses on PRP's progress in training implementation, data systems, and the operationalization of policies across key areas, including bias-free policing, discriminatory policing, sexual assault (SA) and domestic violence (DV) response, and core reporting requirements such as National Incident-Based Reporting System (NIBRS) and hate crime data collection.

Across these areas, PRP continues to demonstrate progress in policy development and the establishment of certain operational frameworks. However, as reflected in the compliance assessments throughout this report, significant challenges persist in required training provision and the reliability of data systems used to document and verify compliance. Recurring deficiencies in training delivery, certification tracking, and recordkeeping, particularly within PTMS and across operational areas, limit PRP's ability to demonstrate that personnel meet required training thresholds. While progress has been made in certain areas, such as Gender Violence training, other critical components, including NIBRS and hate crime training, remain incomplete or not fully implemented.

Moving forward, PRP must prioritize the full execution of mandated training, strengthen centralized and auditable data systems, and ensure consistent application of policies in practice. The successful implementation of a comprehensive RMS, along with continued refinement of training programs and data validation processes, will be essential to ensuring accountability, improving operational effectiveness, and achieving sustained compliance across all assessed areas.

As noted above, because this section is comprehensively assessed in odd CMRs and only select targets are reviewed during this reporting period, compliance ratings for all paragraphs remain the same as in CMR-13. The Monitor's Office refers readers to CMR-13 for the last comprehensive review of Equal Protection and Non-Discrimination.

4. Recruitment, Selection, and Hiring

The Monitor's Office last assessment of Recruitment, Selection, and Hiring was in CMR-12. By the end of this reporting period, PRP sent the finalized and approved version of the 2026 Recruitment Plan and the 2025 Annual Recruitment Plan. Compliance during this reporting period stayed the same as in previous CMRs. Although PRP has seen an increase in resources, improved documentation in recruitment files is needed.

One area requiring improvement is recruitment training for PRP officers generally, personnel inside the Recruitment Office, and the personnel that participate in the recruitment process. As noted in Paragraph 229 of the Agreement, PRP is required to submit the training curriculum to the Monitor's Office for review and approval prior to its implementation. The Monitor's Office received certifications from SAEA that a total of 490 PRP members were administered the recruitment course; however, the Monitor's

June 2026

Office was not provided with a draft of such curriculum prior to its implementation and was not provided with the training materials until March 2026, the last day of the reporting period. The Monitor's Office stresses the importance of the review of such critical training prior to its implementation, the submission of the training after the fact creates the potential for delays and regression in compliance.

During this reporting period, the Recruitment Office also published a Recruitment Annual Report, which has been a longstanding recommendation by the Monitor's Office. The Monitor's Office commends PRP for undertaking this task. The Monitor's Office expects the report to be publicized to all PRP members, and if PRP deems appropriate, to the public.

The Monitor's Office requested candidate background files from Class 235, including a polygraph exam, credit history, criminal history, psychology test, and medical test, among others. PRP submitted the requested files, and the Monitor's Office found the files to be partially compliant with the requirements of Paragraphs 104, 107, and 108 due to inadequate recordkeeping that would substantiate each requirement in the documents sent to the Monitor's Office. PRP has undertaken the task of streamlining the recruitment process and has at its disposal various polygraphers. The background investigations are now being conducted by PRP in a timelier manner.

The Recruitment Office recently demonstrated to the Monitor's Office a new platform that was developed for recording and tracking recruit files, which the Monitor's Office deemed consistent with general policing practices. With the recent acquisition of solutions offered by Axon and Benchmark Analytics, the Commonwealth's contractor, that will be Bureau-wide, the Monitor's Office is unsure whether this platform will require changes in the future to ensure interoperability. Any change in the platform should proceed without delays affecting the recruitment process.

Overall, PRP's compliance with the eight Recruitment, Selection, and Hiring paragraphs assessed during this reporting period reflect the same levels of compliance as what was noted in previous CMRs. In CMR-12, seven paragraphs were assessed as partially compliant and one was found to be partially compliant. The rating for CMR-14 remains the same. See figure 4.

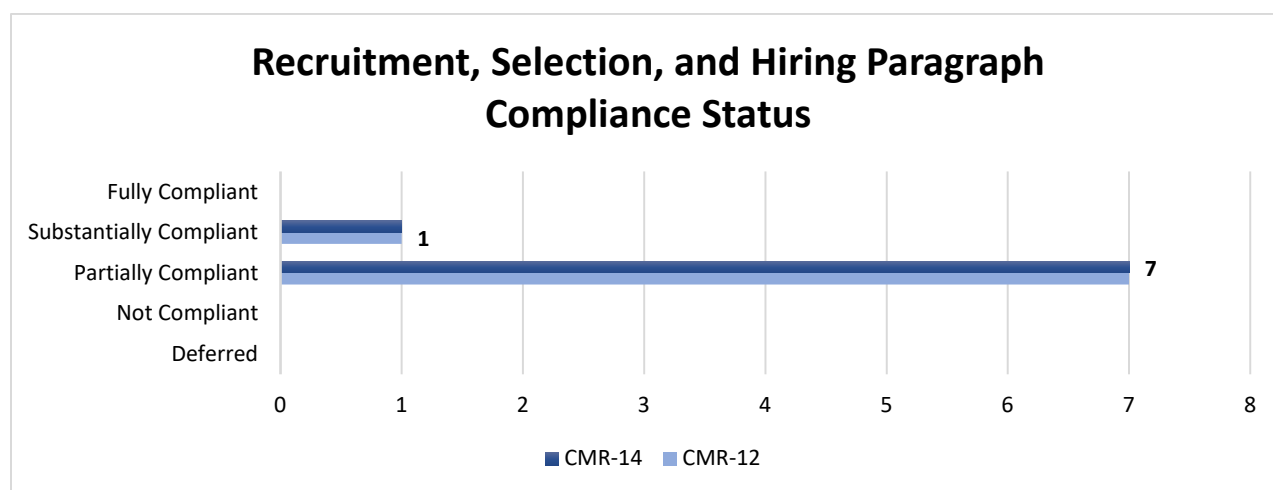


Figure 4. Recruitment, Selection, and Hiring: Paragraph Compliance Status

June 2026

5. Training

During this reporting period, PRP continued to develop and refine its training framework across pre-service education, field training, in-service instruction, and training records management. Collectively, these efforts reflect a structured approach to strengthening training systems and aligning them with Agreement requirements. While notable progress has been achieved in certain areas, particularly within the Field Training Officer (FTO) Program and pre-service curriculum development, other components, most notably 2026 in-service training implementation and training records management, remain in early stages of development and implementation. In addition, training records management remains in earlier stages of technological operational maturity with the pending implementation of new systems.

At the academy level, PRP and SAEA have advanced the Pre-Service Education and Training Program through curriculum enhancements, expanded instructional hours, and the completion of a formal training needs assessment. The program reflects alignment with departmental policy and provides a comprehensive foundation for cadets. Partnerships with external academic institutions continue to support this effort, although opportunities remain to further integrate these collaborations and ensure consistency with evolving policy requirements. These developments represent meaningful steps toward institutionalizing a more deliberate and evaluative approach to pre-service training.

The FTO Program stands out as a well-developed component of PRP's training system, demonstrating strong implementation of policy, structured evaluation processes, and consistent oversight. Enhancements to program design, including updated policies and curriculum, have contributed to near-full compliance with applicable provisions. The planned transition to a 400-hour model represents a significant next phase with the potential to further strengthen field-based learning, provided that PRP can demonstrate measurable outcomes and sustain effective implementation. The Monitor's Office notes that during the drafting of this report, materials on the revised FTO program were submitted for review. The review of such materials will be incorporated into the next assessment of the Training section.

In contrast, in-service training continues to face implementation challenges. Although PRP has established policy frameworks and initiated efforts such as training needs assessments and ongoing course delivery, it has not yet demonstrated the ability to ensure consistent completion, tracking, and verification of required annual training hours. Key elements, including role-based training structures and the full integration of roll call training into formal systems, also remain underdeveloped. As a result, in-service training has not yet achieved the level of consistency and accountability required under the Agreement.

Similarly, while PRP has begun modernizing its training records infrastructure through policy development and the transition to a new data management platform, the system is not yet fully operational or validated. Current documentation does not demonstrate a centralized, comprehensive, and reliable method for capturing, maintaining, and reporting training data across the Bureau. Continued efforts to implement and verify an integrated records system will be essential to support both compliance and long-term sustainability.

June 2026

PRP's training system reflects a combination of meaningful progress and ongoing challenges. Advancements in pre-service training and the FTO Program provide a strong foundation; however, sustained focus on fully operationalizing in-service training and establishing a reliable, centralized training records system will be critical to achieving full compliance with the Agreement.

Overall, PRP's compliance with the 18 Training paragraphs assessed during this reporting period reflects the same levels of compliance to those noted in previous CMRs. In CMR-12 and 14 56% of paragraphs (10 paragraphs) were assessed as partially compliant and 11% of paragraphs (2 paragraphs) were assessed as substantially compliant. See figure 5.

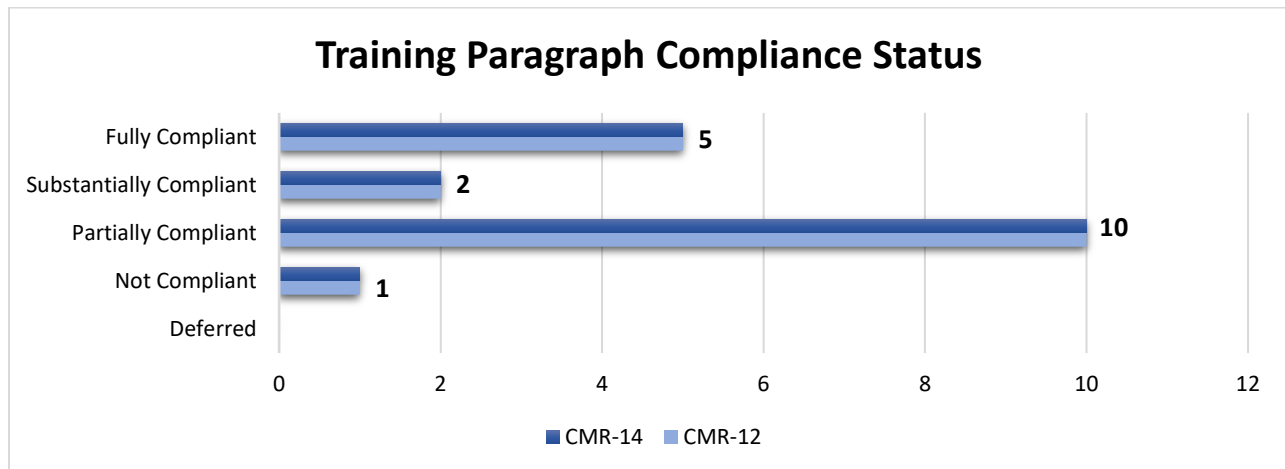


Figure 5. Training: Paragraph Compliance Status

6. Supervision and Management

The Commonwealth has demonstrated continued progress toward compliance with the provisions of the Agreement. The Puerto Rico Police (PRP) has made significant advances in conducting promotions, assigning newly promoted first-line supervisors, and implementing a new evaluation system. As during the CRM-13 reporting period, AH Datalytics, the Commonwealth's contractor, developed a dashboard to track performance evaluations, training activities, monthly academies, non-punitive measures, and referrals to SARP. In addition, a secondary dashboard is being developed to verify supervisor and agent assignments.

A total of 300 sergeants were promoted to lieutenants, and 61 agents were promoted to sergeants in February 2026. A second sergeant exam was administered on February 7, 2026, with a total of 329 agents passing. These 329 new sergeants are pending completion of the required 40 hours of training before being officially promoted. A secondary exam for agents who were not available on February 7 was scheduled for February 27, 2026.

PRP projects that the Early Intervention System (EIS), provided by Benchmark Analytics, will become operational by mid-2026. These efforts align with the EIS Charter and the presentation of the project scope to the IT Governance Executive Committee, which included representatives from Puerto Rico Innovation and Technology Service (PRITS). Additionally, progress has been made in preparing data sets for the initial data import into EIS. The Policies and Procedures Team, the EIS Unit, and Benchmark

June 2026

Analytics continue to collaborate on the development of policies and procedures associated with the system. The Monitor's Office emphasizes the importance of implementing an internal communication strategy to inform PRP personnel about EIS, its objectives, and the relevant policies prior to the system's deployment. The Monitor's Office, as well as the Superintendent's office, reviewed the General Orders for EIS and Integrity Audits. The Reform Office is currently working on incorporating feedback and expects completion by the end of April 2026.

Despite these accomplishments, the PRP continues to face challenges related to supervisory accountability, the development of the Early Intervention System (EIS), performance evaluations, and the completeness of personnel records and statistical data. PRP has reported ongoing efforts to enhance its dashboard to improve the tracking of supervisory consistency. Specifically, the Bureau indicated that the dashboard will be more structured and systematic by incorporating statistical data from CITA and Benchmark to support updates and analysis. Continued and focused attention to these areas will be essential for the Bureau to achieve substantial compliance.

Recent promotions across supervisory ranks have brought PRP closer to meeting the staffing requirements outlined in the Staffing Plan. However, retirements and resignations continue to contribute to the shortages among first-line supervisors. It is recommended that PRP continue to track all supervisors eligible for retirement within the next two years, as well as those who have departed from the Bureau. Although current staffing deficiencies remain manageable, they continue to represent an area of concern.

Training related to inspection and audit systems within the Inspection Division has been completed and formally approved by the Monitor's Office. Additionally, the Superintendent, or a designated representative, conducted a comprehensive review of all inspection reports corresponding to the CMR-14 reporting period. The Division further implemented a system within the inspection platform designed to facilitate the timely review and disposition of pending reports by the Superintendent's Office. Notwithstanding the staffing level of only 23 assigned personnel, the Inspection Division conducted 150 inspections as of December 1, 2025, reflecting a notable level of diligence and commitment to compliance with this requirement.

Ongoing concerns remain regarding assignments within the Transfer Unit, performance evaluations, vehicle shortages, and limited repair budget issues acknowledged by PRPB management. While plans and systems are being developed to address these challenges, documentation of related meetings and decision-making processes remains limited. Improvements in these areas have been partially attributed to the appointment of new supervisors and management's directive to formalize roll call meetings. Continued emphasis on training and proper documentation of these practices is recommended.

The new performance evaluation system is in place and 95% of supervisors have completed the required training. A review of evaluation samples showed improvement in ratings, scoring summaries, and written justifications. However, interview data from December 2025 and January, February, and March 2026 revealed that 35% of personnel continued to report having no meeting with their supervisors to discuss evaluations and career development. Forty percent of personnel interviewed reported that they were only asked whether they agreed with the evaluation, which demonstrates a misunderstanding by officers of their rights during evaluations. This signals that some supervisors are either not understanding or not following the revised policy. Management must emphasize the value of these meetings, ensure

June 2026

compliance, and make clear to their officers that checking the box in the evaluation as having held a meeting is not satisfied by simply asking if they agree with the evaluation.

Additionally, some evaluations were conducted by supervisors who neither oversee the evaluated employee nor share the same shift, highlighting the ongoing use of acting supervisors. PRP continues to struggle with supervisory accountability and with maintaining comprehensive personnel records and statistical data. Direct and consistent supervision remains problematic, including supervisors working different shifts than their supervisees and the frequent use of acting supervisors. A total of 254 sergeants had left the organization, and another 300 were most in February 2026 due to promotions, representing an overall loss of 554 sergeants. With 61 new sergeants promoted in February 2026, the net shortage of sergeants stands at 493, which significantly contributes to these challenges. Interviews also revealed instances in which evaluations were conducted by supervisors who did not directly supervise the evaluated employees or who worked on different shifts. Additionally, acting supervisors continue to perform supervisory duties, although these concerns were reported by only 10 percent of interviewees. Technological enhancements supporting the new evaluation system are detailed in the IT section.

Overall, the Commonwealth's compliance with the 24 Supervision and Management paragraphs assessed during this reporting period reflects similar levels of compliance to what was noted in previous CMRs. In CMR-12 and 14, 50% of the 24 paragraphs (12 paragraphs) were assessed as partially compliant and 17% of the 24 paragraphs (4 paragraphs) were assessed as fully compliant. See figure 6.

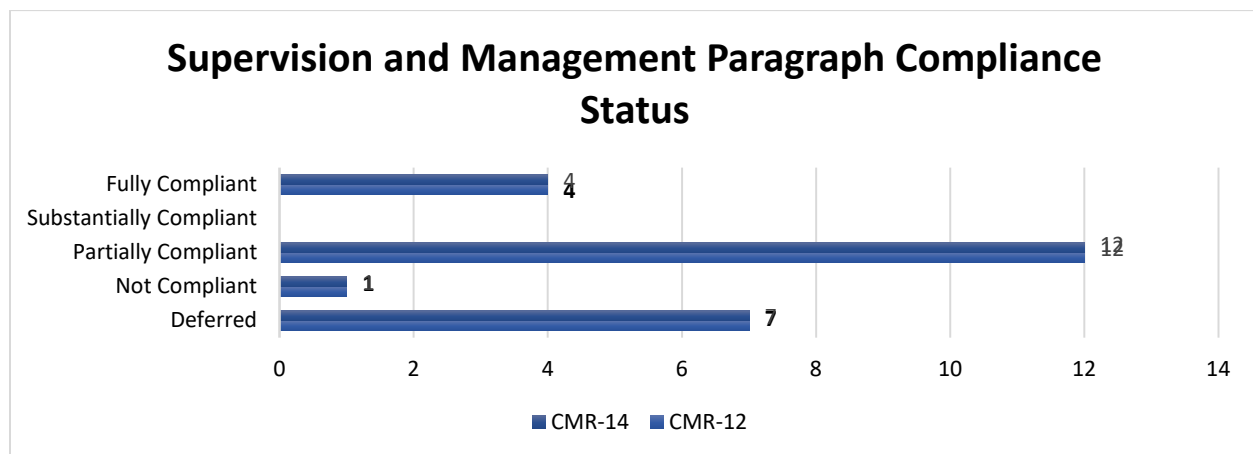


Figure 6. Supervision and Management: Paragraph Compliance Status

7. Civilian Complaints, Internal Investigations, and Discipline

A growing body of evidence leading up to this report clearly indicates that the PRB has reached a plateau of compliance with SARP internal investigations procedures, methodology and compliance with Agreement timelines. Without change, the Monitor's Office sees any near-term increase in compliance levels across multiple paragraphs as highly improbable.

To be fair, the agency has made progress over the past six years. Section IX compliance advances over these last several years are largely attributable to delivering some desperately needed resources to SARP, creating and delivering better training, and making internal some investigative methodology and rules changes – both actual and pending.

June 2026

To date, the Monitor has interviewed over 175 current and former SARP members who have been assigned to, conducted, supervised, oversaw, directed, and or adjudicated internal police investigations over the past six years. Most of these persons have been interviewed three or more times since the monitoring period began, adding up to hundreds of face to face interviews.

The Monitor has a nearly identical interview record of Complaint Analysis and Evaluation Section ("SEAQA") and Office of the Legal Advisor ("OAL") adjudicators, including the colonel overseeing the adjudicatory process for the Superintendent. These departments are jointly and severally responsible for adjudication and verification of complaints in addition to assuring overall quality.

SARP administrative investigators continue to report active caseloads in double digits. This is alarming when one considers the strict timeline of 180 days or less for completion of a SARP administrative investigation. The Monitor sees PRP struggling and failing to keep within the administrative timeframe mandated by the Agreement for both investigations and adjudications. In this current sample, the Monitor's Office detected that approximately 30 percent of SARP administrative cases exceed the 180 (90+90) day rule for completion.

Most SARP investigators described improvements in transportation and basic infrastructure resources, while continuing to mention human resources as less than sufficient. This opinion of insufficiency is more acute among internal affairs and administrative investigators. Clearly there remains a need for some additional human resources; additional administrative and criminal investigators, competent adjudicators, OAL secretaries, etc.

There remains a separate analysis apart from the human resource factor. Specifically, the Monitor questions the efficiency and efficacy of PBP's current internal quality controls, adjudication processes and notification processes. For an agency that routinely fields and investigates well over one hundred citizen complaints each and every month without stop – these processes have consistently fallen well short of agreed-upon timelines and will require change to see any resulting improvement in compliance levels.

The Monitor's Office carefully analyzes each randomly selected case from receipt of the complaint up to the completion of the investigations and command approvals (Phase I Analysis). This qualitative review looks at the timeliness of each aspect of the case, the investigative methodology and tactics used, thoroughness, whether the conclusion was evidence-based, and whether or not the ultimate conclusion was supported by the "preponderance of the evidence" standard of proof. Phase I cases are all eligible for a later Phase II Analysis once the case has been reviewed thoroughly and signed by the Superintendent.

In Phase II analyses, the Monitor looks at the overall thoroughness of the post-investigation review process, whether final correct findings are based upon all relevant evidence available, whether there was any analysis of the complainant's complaint and disciplinary history, whether any discipline assessed complies with present rules and whether all parties to the complaint were effectively notified within 30 days of the end of the investigation. All of these areas and timelines are mandated by the Agreement.

June 2026

For this CMR, the Monitor reviewed 38 SARP investigations for Phase I Analysis with 12 additional cases subjected to a Phase II Analysis. It is important to mention that some of the most promising Phase I cases reviewed were among the most recently concluded SARP investigations. Some of the weakest Phase I examples were found in cases originating several years ago, which for a variety of reasons are only now being finalized and adjudicated. Due to SARP's prior and in some cases ongoing practices, the Monitor is left to analyze cases that may easily range as far back as four years. These investigations, including ones that are dated, are paired with recent adjudication and notification data. The Monitor expects that future IT changes will assist PRB in better policing and enforcing its investigative and adjudicative timelines. The Monitor expects to review recently concluded cases more consistently as a result of increased conformance with investigative and adjudicative timelines.

Not all subpar areas are being actively remediated or addressed by the agency. The Monitor has yet to see a single complaint of criminal nature against a PRPB being assigned within 5 working days to both criminal and SARP administrative investigators for simultaneous investigation. This is mandated under Paragraph 173 of Agreement. In a similar vein, the practice of re-assigning SARP administrative cases to Asuntos Internos criminal investigators – most of whom have just completed a criminal investigation based upon the exact same facts - continues. Besides constituting a violation of the Agreement, this practice will eventually cause legal problems for the agency, especially in a scenario involving the misuse of the Garrity Warning. This is clearly a preventable risk.

The Monitor's desk study of the current investigative case sample reveals a discouraging and lower level of compliance than seen in recent CMRs. Of the 38 cases analyzed for this CMR, the Monitor found only 1 in 4 cases as substantially compliant, 2 out of 5 were found in partial compliance, and over one third were found as non-compliant. While PRB had previously made some positive changes to address SARP's dire lack of resources, the quality errors seen here appear to be more related to a lack of due care and proper oversight exercised at each of SARP's five levels of internal supervision and review.

The Monitor concludes, after having interviewed every SARP investigator multiple times over the past six years, that the majority of SARP investigators are competent to handle their very difficult mission. With few exceptions, the Monitor's Office also concludes that current SARP investigative and adjudicative workforce is both trained and motivated. However, despite this level of training, readiness and competence, many of these SARP investigators, Hearings Officers and adjudicators describe being overtasked, and others report being severely overtasked. Over-tasking in any profession that imposes strict timelines on product delivery increases the likelihood that oversights or errors will occur. No amount of training, preparation and competence can compensate for an insufficient level of human resources in any agency or enterprise. The Monitor concludes that the present insufficiency of human resources and ongoing miscalculations in SARP's division of labor are among the principal causes of defects in internal investigations and internal adjudicative findings.

Similarly, the adjudicative units of SEAQA, OAL and the Office of the Superintendent have been incapable of helping SARP reach substantial compliance as currently comprised. A significant number of completed investigations lack adjudication and notification of all parties within the 30-day limit post-investigation period. With a paucity of "adjudicators" assigned to this task, including some without any legal training at all, investigator errors and oversights are often missed.

June 2026

During the March 2026 field study visit in Puerto Rico, the Monitor was encouraged to hear that the PRB is in the early planning stage to increase its SARP staffing. PRB is looking at a special convocatoria for SARP Metropolitan delegations in dire need of additional investigators. As recommended by the Monitor on previous occasions, those responding to this convocatoria should be informed that the purpose of this convocatoria is only to fill vacancies in the depleted metropolitan delegations, and that transfers out of these assignments to the metropolitan area will not be considered for a minimum of three years. This will help SARP ensure that investigators are assigned to work in areas where they are desperately needed, and not necessarily where an investigator prefers to report for work.

The Monitor's Office is mindful that some internal administrative investigations should be assigned outside the area of occurrence to avoid a potential conflict of interest or appearance thereof. Six years of review reveals that SARP "ethical dilemma" assignments are the exception, not the rule. PRP efforts to balance case distributions and SARP workloads across the island have not yielded anticipated results. Underused investigators assigned to investigate cases located on the other side of the island commute for hours in traffic in a fleet that is just beginning to show some sufficiency and roadworthiness. Investigators from the west report being assigned cases located far from their assignment, frequently in the Metropolitan area. These investigations involve in-person interviews of civilian complainants and witnesses in other parts of the island, securing transportation to these locations, and driving back and forth from these sites during the work day, almost invariably in heavy traffic conditions. While the majority of SARP investigators now report access to a fleet of safer, roadworthy vehicles assigned to meet their needs, most SARP investigators, particularly those conducting administrative and Internal Affairs investigations, continue to cite human resources as lacking.

Before moving an administrative or internal criminal investigation posing no apparent ethical dilemma from any given area, the Monitor's Office strongly recommends that SARP decision makers consider the assigned investigators' estimated travel time to this outside location, the sufficiency and safety of transportation available, the estimated amount of time the investigator will spend away from their assigned area, and the number and type of cases that are presently assigned to that officer. Assigning a case located hours away from an investigator carrying a full caseload of 12 or more SARP cases is an unproductive practice and will remain a factor adverse to findings of increased compliance.

Overall training of the workforce in SARP and PAE related matters has now become a compliance issue for the PRB. The lack of proper training or citing officers for 2026 mandatory training has resulted in a number of downgrades in compliance across multiple Section IX paragraphs where training is cited as a compliance factor. These failures should be cured once PRB trains these members or cites them for training over the near term.

The Monitor requested a special sample of 8 current reprisal cases investigated during this reporting period so as to have sufficiently reliable data to analyze. With this review now concluded, the Monitor found that some of the investigative procedures used lacked quality. All of these cases involved an allegation of reprisal or discrimination against a PRB of lower rank. In this desk study, the Monitor was deeply troubled to find that two cases – one quarter of this sample – were sent out for preliminary investigation by SARP instead of being sent out for a full administrative investigation from the very beginning. This is highly irregular. Moreover, both cases were archived instead of being forwarded for

June 2026

a full investigation. Out of the eight reprisal cases analyzed in the desk review, half were non-compliant. Out of the 8 reprisal cases, the Monitor found only one case to be substantially compliant, the 3 remaining were assessed as only partially compliant.

Everyone understands that Internal Affairs is the only unit in the PRB responsible for conducting sensitive, clandestine criminal investigations concerning alleged criminal misconduct on the part of any PRP member. As has been reported in every CMR since the beginning of the monitoring phase six years ago, these Internal Affairs delegations continue to operate from police areas where every person assigned there knows their identity and what official and private vehicles they operate. Nothing written in the Agreement obligates the PRB to move these offices into proper locations not within or in proximity to active police installations. However, the Monitor's observations in over 350 analyzed cases and hundreds of private interviews with SARP investigators leads to one irrefutable conclusion - it is impossible for PRB Internal Affairs units billeted in police facilities to successfully achieve a mission of investigating criminal behavior committed by co-workers. It is wholly untenable to expect investigators to use sensitive, clandestine measures, methodologies and covert surveillance to successfully investigate the same officers that they serve alongside with and see every day.

Overall, the Commonwealth's compliance with the 46 paragraphs assessed during this reporting period within Civilian Complaints, Internal Investigations, and Discipline reflects some regressed levels of compliance with what was noted in previous CMRs. In CMR-13, 48% of paragraphs (22 paragraphs) were found to be partially compliant and 15% (7 paragraphs) were found to be substantially compliant, in comparison to the current reporting period, where 57% of paragraphs (26 paragraphs) were found to be partially compliant and 7% (3 paragraphs) were found to be substantially compliant. See figure 7.

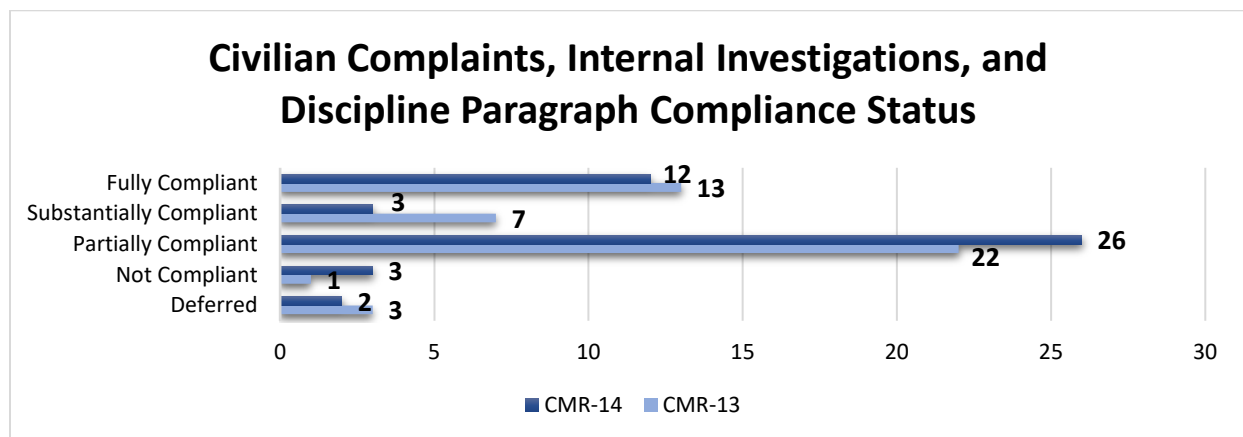


Figure 7. Civilian Complaints, Internal Investigations, and Discipline: Paragraph Compliance Status

8. Community Engagement and Public Information

Most paragraphs in this Section are assessed on an annual basis during odd numbered reporting periods. Accordingly, a comprehensive assessment of Community Engagement and Public Information will be conducted during CMR-15. During this reporting period, the Monitor assessed compliance with Paragraphs 211, 212, and 217 only. Although these paragraphs are generally reviewed on a semiannual

June 2026

basis, this CMR is limited to the specific compliance targets designated for assessment during this cycle, which are bolded throughout the section. As a result, all compliance ratings during this reporting period are carried over from the last CMR.

During this reporting period, PRP introduced Reform Stat as its primary self-monitoring mechanism and prioritized reviewing activities related to Paragraphs 208 and 212. While Reform Stat reflects an effort to formalize internal monitoring, it does not yet include comprehensive policy review, approval, or corrective action processes sufficient to support compliance across this Section. Foundational policies required by the Agreement, including the Community Policing Policy (GO 803) and the Encuentros Comunitarios/Open Meetings for Public Information Policy (GO 805), were finalized and approved on April 13, 2026. The CIC Rules and Regulations Manual, intended to supplement GO 801, was also finalized and approved on April 23, 2026. The approval of these Bureau wide policies closes the gap that has impeded PRP's development and implementation of a required Bureau wide Community Engagement Plan and the supplemental plans for each of the 13 police areas. Without approved plans supported by area specific strategies, PRP was unable to demonstrate compliance with multiple paragraphs in this Section. Operational deficiencies relevant to Paragraphs 206 and 207, which are subject to compliance assessment in CMR-15, further limit PRP's ability to meet Agreement requirements.

PRP initiated the community engagement operational plan under a pilot program at the conclusion of CMR-13, implemented in the police areas of Arecibo, Aguadilla, Guayama, and Humacao. Demonstration of progress toward compliance under the pilot required PRP to submit comprehensive deliverables, including assessments of pilot areas; the identification of challenges and lessons learned; documentation of community and stakeholder feedback obtained through the CICs; and corresponding corrective action plans. PRP submitted evidence addressing these elements on March 31, 2026. Notwithstanding the Monitor's mid-period guidance advising against expansion prior to completing assessment and corrective planning, amid the risk of replicating deficiencies without specific corrective plans, the Commonwealth proceeded with full implementation of the operational plan, extending it to the remaining police areas in February 2026 while the pilot remained under implementation.

The Monitor's Office reviewed PRP's pilot analysis and supporting documentation submitted for this reporting period. Through the pilot's analysis, PRP internally validated the Monitor's Office's previously documented findings, including the need to strengthen mechanisms for integrating, planning, documenting, evaluating, and reporting initiatives more cohesively. The documentation further identifies the need to assign responsible parties and to define roles and responsibilities for communication, internal controls, monitoring, and follow up, including the need for the development of technological tools and unified processes intended to promote consistency, data integrity, and quality controls to enhance the reliability of decision making. Of equal importance, documentation reflects the need to strengthen personnel capacity through training to support effective implementation of operational plans.

Implementing and expanding the operational plan within the organization is a foundational step toward developing a Bureau wide community engagement plan. A continuing challenge remains in establishing feasible timelines to bridge gaps in structural practices, documentation, and effective community engagement; to demonstrate progress toward reducing delinquency and crime; and to improve the

June 2026

community's quality of life. A complete assessment of the operational plan implemented under the pilot program will be conducted during the CMR-15 reporting period. This forthcoming evaluation will provide a comprehensive review of the pilot's effectiveness, extending to other areas under the Monitor's sample, including its operational components, the outcomes achieved, and its alignment with broader compliance requirements. The assessment will encompass all relevant deliverables associated with the pilot, ensuring that progress, challenges, and lessons learned are thoroughly analyzed as part of the full evaluation cycle and corrective action plans.

During the CMR-12 reporting period, PRP reported that nearly 95 percent of its personnel received training. Despite this high level of participation, no further training related to community-oriented policing was conducted in the current cycle. However, the expansion of PRP's 2026 in-service training plan, which now includes revisions to REA 803 and the addition of a course in effective and active communication, offers an opportunity to address previously identified training gaps. These gaps were highlighted and validated through lessons learned during the Pilot program. The updated training plan also forecasts participation from the Community Interaction Councils (CICs) in the review process supporting ongoing efforts to strengthen community engagement initiatives in alignment with Agreement requirements. However, the specific scope and definition of CIC participation in this process require further clarification and streamlining. Technological and data management limitations continue to affect PRP's institutional capacity to fully demonstrate compliance. Ongoing administrative and technical challenges affecting data collection, analysis, and validation within the electronic Community Policing module limit PRP's ability to produce consistent, reliable, and verifiable evidence supporting Agreement requirements related to community engagement, alliances, and problem-solving activities. These limitations undermine effective performance measurement, timely corrective action, accurate reporting, and the institutionalization of compliant practices. Strengthening and stabilizing these systems is necessary to support performance measurement, informed corrective action, accurate reporting, effective implementation of practices, and transparent communication with community stakeholders and the public.

Continued progress in future reporting periods is contingent upon several key factors: completion, implementation, and monitoring of a Bureau-wide Community Engagement Plan supported by corresponding area-specific plans; the delivery of relevant personnel training; and the deployment of community policing tools in collaboration with technology vendors. Sustained advancement will depend on consistent execution and demonstrated alignment of these activities with the Community Engagement Plan and associated compliance controls.

As noted above, because this section is comprehensively assessed in odd CMRs and only select targets are reviewed during this reporting period, compliance ratings for all paragraphs are carried over and remain the same as in CMR-13. The Monitor refers to CMR-13 for the last comprehensive review of Community Engagement.

9. Information Systems and Technology

Compliance for IT remains "deferred" as PRP continues its efforts to implement Axon and Benchmark. However, the Benchmark implementation was stalled four months due to the expiration of its contract

June 2026

without immediate renewal and the Axon development was halted due to a file management (incident reporting and supervisory review) and user access flaws that could not meet chain of custody requirements thereby leading to suspension of development until Axon could propose a solution. Schedule and cost risks associated with these implementations are therefore elevated.

PRP also confirmed in March 2026 that it will further develop its legacy Computer Aided Dispatch (CAD) system. This approach differs from the Monitor's recommendation that PRP conduct an Analysis of Alternatives to assess industry options and identify a competitive solution through a full and open process.

Throughout compliance monitoring the Monitor's Office has urged that PRP focus intently on IT management details, resources, rigor and planning and to also seek third party expertise to support management in order for the Parties to be confident that PRP and the Bureau of Technology (BT) are eventually capable of effectively sustaining its pursuit of technology solutions beyond the end of monitoring. During CMR-14, PRP showed signs that its planning capacity had begun trending upward. Its collaboration improved with the Monitor and contractor subject matter experts, Gartner for research and programmatic support, and AHD in a "quasi" staff role as the recognized PRP data managers. That said, more collaboration and transparency are necessary to achieve optimal outcomes while noting that contract renewal for all SME's supporting BT is imminent (June 2026). It is critical for PRP to ensure smooth contracting to avoid any break in service regarding access to SMEs. The consequences of failing to contract in a timely manner will include an immediate "stop work" and schedule delays that will elevate the ensuing implementation risks. It is the Monitor's Office opinion that PRP is not yet capable of sustaining its efforts independently at this time. Details are as follows.

Management, Discipline, and Cadence

PRP is managing through and must overcome current schedule delays related to the functional capabilities of RMS and the contract processing mandates of the Government. For instance, beginning in October 2025 the Benchmark solution development was stopped due to expiration of their contract and the need for a new Purchase Order. This breakdown led to suspension of PRP's collaboration with Benchmark and several months of effort were halted, impacting not only Benchmark but also leading to inefficiencies with the PMO project team. To which, similar issue befell the program office contract project lead overseeing training. Furthermore, Axon experienced a schedule slide that will push its planned initial implementation minimally into the fall of 2026 from July. The slippage is traceable to Axon's processing of incident reports that when being edited do not comply with PRP's chain of custody standards. And although not compliant with PRP's processing workflow, the question should be asked as to why the issue wasn't identified sooner. The Monitor's Office has concluded that needed resources were not available to adequately support requirements development and/or review of use cases. A requisite Quality Control/Quality Assurance process could have spotted this flaw but one doesn't exist at PRP, although raised by the Monitor and SMEs during previous CMRs. Positively speaking, it is notable that the PRP team eventually diagnosed the flaw in the Axon system that needed to be rectified. Had it not been found prior to launch the results could have been significant to incident record keeping and user acceptance. But delays associated with this issue will be appreciable and are arguably attributable to the limited management resources available to the Bureau of Technology at PRP.

June 2026

Associated IT risk will remain significant and PRP must recognize it as such. Comprised of numerous indicators, effective technology management is a composite of procedural rigor, a sense of urgency, and extensive communication and transparency, all of which are characteristics essential to PRP's eventual self-sustainability. To deliver tools, systems, processes and useful data that enable effective policing and staff operations while also being able to harvest essential data from IT systems It follows that PRP will need to continue to elevate its strategy, planning and resource management to achieve and maintain self-sustainability and rely on subject matter experts who can offer additional insight, options and research. Shaping its aspirations as well as the next generations of technology and data without this hyper vigilance as schedules converge will be daunting.

Technology

In addition to both the Axon and Benchmark developments cited above, legacy IT systems at PRP continue to operate with limited updates as agreed to by the Parties and Monitor's Office in order for the Commonwealth to prioritize resources for Axon and Benchmark.

As far as other information technology demonstrations and assessments, monitors have noted that ongoing efforts have shown limited measurable progress, and that, PRP's 90-day reports are overstating both progress and completion. While PRP highlights activities such as planning, developing checklists, or drafting training modules, the Monitor's findings show very limited measurable progress. For example, most of the Equal Protection and Non-Discrimination requirements remain only in partial compliance, and several core training components have not yet been implemented. The discrepancy appears to be related to how PRP reports present process-level steps as completed actions. On the other hand, the Monitor evaluates compliance based on demonstrated operational performance. Until PRP can show that these reforms are fully implemented, functioning consistently across the agency, and meeting required thresholds, the paragraphs cannot be considered substantially or fully compliant. [DR2.1]

As an example, during a recent technology demonstration in February 2026, manual recording of mileage was discussed. Axon integration may be able to reconcile transport mileage, but it is unclear at this time if it is possible or within the contractual scope. Further, procedurally not all traffic stop data is entered into GTE and only populated if an arrest is made. This protocol does not support a need for gathering all traffic stop data which may be necessary for profiling analysis irrespective of whether an arrest is made or not. Further, it isn't known yet whether the PPR 126.2 Complaint Card is properly linked when multiple perpetrators at an incident may be transported in different vehicles going to different locations. These types of unresolved workflow and technology issues are discouraging in that they are relatively straight forward fixes to be incorporated in technology upgrades and enforced by supervisory oversight, policy revisions and training.

In other areas, at Utuado, the Sexual Assault module timeout issues are no longer occurring although they were reportedly being experienced in Guayama and San Juan. In Bayamon there were unanswered questions about supervisors being notified when a file had been created in GTE. These types of "day-to-day" issues while troublesome should be correctable with proper focus on system upgrades and effective training.

June 2026

With regard to PRP enterprise-wide training, late in CMR-14 traction was established between the IT Program Manager and Training Monitor but it was also disappointing to note that IT training is largely non-existent at this time but for the workarounds provided by the Bureau of Technology. The relationship between BT and SAEA is inadequate and has been throughout the monitoring period. A telling measure of the disfunction, timelines for SAEA's provisioning of training content are not in-line nor supportive of Axon and Benchmark deployment schedules during 2026 irrespective of the ongoing development delays. This shortcoming would have borne itself out negatively had PRP actually maintained a July 2026 deployment of Axon, but which would have been impacted by a lack of training materials.

Looking Forward

Beyond eventual compliance with the Agreement, PRP's technology management process control maturity will be essential to sustaining reform outcomes. Notwithstanding the significant efforts of the Parties, the Monitor's Office, Subject Matter Experts, and resources directed by the Courts, PRP's capacity to independently transform and improve its technology infrastructure and capabilities has not yet been demonstrated. Questions regarding PRP's long-term self-sustainability in this area therefore remain. The Commonwealth must continue its efforts to comply with the fundamentals of the Decree and institutionalize a professional IT cadre of technology experts with contemporary skills capable of advancing technology solutions through multiple generations of improvement, while also leveraging third-party expertise. Equally important, efforts made to date cannot stop once Axon and Benchmark are initially operationalized. Continuous improvement must become part of PRP's IT culture.

The course of action ahead is formidable and if PRP is to be successful it must maneuver through the bureaucratic obstacles, procurement and contracting noted above in order to plan effectively, manage outcomes and clear obstacles (resources and contracting) in a timely manner, retain its key staff and contractors, and mitigate the issues facing these very risky developments and deployments. With respect to eventually achieving sustainability, process execution and follow-through are essential to effective implementation and sustainability. The following should be formalized.

a) Leadership

1. Support from all leaders, up to the Superintendent, must be overtly visible.
 - a. Horizontal collaboration with other responsible managers across the Decree is a must. As of mid-March, disconnects are evident between IT delivery and Training including that from SAEA.
2. PRP must be willing to endure failure and to commit appreciable resources. Implementation of Axon and Benchmark Analytics solutions are foundational first steps and not the end of the transformation effort.

b) Planning, Management and Rigor

1. Planning and reporting should be streamlined to incorporate fewer hygiene details (i.e. meetings held) and focus on key determinants of status. For example, regarding cost, schedule and performance, communicate simply and forthrightly with only the necessary narrative using for example Red/Yellow/Green reporting formats. Current narrative claims of

June 2026

- progress and completion without evidence undermine credibility. Eliminate low “return on investment” activities.
2. Consider recasting the IT Corrective Action Plan, streamlining it, and focusing on critical informative metrics and decisions. Isolate actionable tasks that lead to decisions and outcomes.
 3. The established Master Integration Plan must be used to regulate integration across all systems and initiatives.
 4. Cyber planning, investment and hardening must be in focus and profound.
 5. Risk Management, a critical component of project decision making needs to be addressed as a primary focus when reviewing status and planning actions. Risk should be reviewed in every meeting.
 6. Institutionalize Quality Assurance and Quality Control Practices.
 7. Contract Management must be timely.
 8. Data validation and purification practices critical to the migration from RMS to Axon and EIS to Benchmark must be institutionalized and adhered to.
 9. The Network Maintenance Plan should incorporate more detail and include budget and risks.
 10. IT Management and delivery staff must be adequate and skilled.
 11. An Enterprise/Systems Architecture must be formalized to guide goal setting and decision making and include an established portfolio of technical functionality and capabilities.
 12. The Commonwealth would be well served to institutionalize a Lessons Learned practice.

c) Collaboration

1. Training support must be timely.
2. Communication between PRP HQ and the field must continuously be exercised and improved.
3. Transparency and Communication must be fluid at all times.

In Summation

The Commonwealth continues to show progress but there is still much to do and PRP and BT must be willing to seek and accept advice and assistance from outside the Department. Whether the Commonwealth institutionalizes an organic expert IT cadre or it depends on industry experts through contracting, IT management is not trivial and must be embraced as an essential tool to effective policing and supervision. Technology cannot be viewed of as “an IT thing” and supervision must hold themselves accountable for technology success as a force multiplier. Case studies and experience show that without visible support from seniormost leaders, technology implementation is at risk and inefficiently deployed.

The Monitor’s Office again reiterates that the Commonwealth, 1) to the fullest extent possible continue to use expert advisory services and subject matter experts when optimal, 2) embrace third party validation and verification in technology and process development and delivery which has not begun, 3) prepare for long term sustainability and rely on succession planning and knowledge transfer strategies to staff the IT cadre, 4) optimize the use of relevant metrics to routinely assess performance across its management and operational domain, and 5) dedicate itself to rigorous cyber planning and hardening as well as continuing infrastructure assessments.

June 2026

The Monitor's Office remains optimistic that progress will continue, while recognizing that claims of progress must continue to be supported by documented evidence. The shift to evidence-based reviews during CMR-14 was necessitated by the limited verifiability of previously reported progress. Ultimately, to validate proper implementation, functional and data audits will be required of Axon and Benchmark and any legacy capabilities that are carried forward. Accurate data migration is non-negotiable in this regard. Better communication across the IT Team and PRP would go far to eradicate project status misunderstandings in the field and the Parties should remain both skeptical and vigilant to ensure focus and urgency with regard to these projects

Overall, the Commonwealth's compliance with the six Information Systems and Technology paragraphs remains unchanged due to the agreement between the Parties to defer ratings until Axon and Benchmark Analytics implementations are complete. See figure 9.

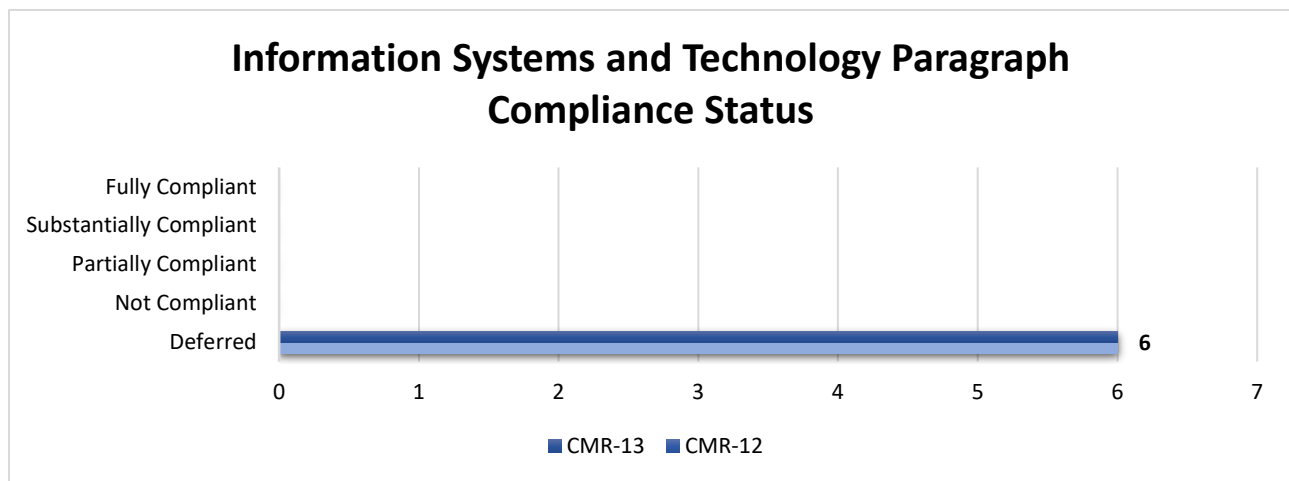


Figure 9. Information Systems and Technology: Paragraph Compliance Status