

June 2025



Executive Summary for the Twelfth Report of the Federal Monitor, Covering the Period from October 2024 through March 2025

This is the twelfth Chief Monitor's Report (CMR-12) 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 twelfth 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 2024 through March 2025.

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. The most notable change during this reporting period is the deferment of various paragraphs due to the Commonwealth's work on implementing the new Axon Records Management System (RMS) and the modules developed by Benchmark Analytics. The addition of such processes and technologies affects many, if not all, of the areas of the Agreement. As such, a number of paragraphs directly affected by these improvements are listed as deferred in this CMR. This rating, provided that the Commonwealth continues its efforts in implementing RMS and the related Benchmark Analytics modules, demonstrates that the Commonwealth is working towards improvement. Any changes to compliance during this reporting period were largely based on continued implementation of the requirements related to staffing and supervision, refinements in operational practices related to Uses of Force (UOFs) and administrative investigations, and sustained improvements in the Field Training Officer (FTO) program and pre-service training. During this reporting period, the Commonwealth also began conducting its 2026 Training Needs Assessment, with the objective of better informing its training needs and priorities as it begins to plan for the 2026 in-service program. As noted in previous CMRs, the Monitor's Office continued to note various gaps in training (i.e., recruitment, ethics, scenario-based trainings), data analysis, and community engagement that hinder its ability to move compliance forward. It is the Monitor's Office's hope that the training needs assessment will highlight a pathway forward for PRPB to address these gaps in 2026 and in the near future.

The Commonwealth's continued progress at this point hinges 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. As many areas of the Agreement are directly impacted by these improvements, it is imperative that the Commonwealth continue to prioritize its resources and attention to these matters. The Monitor's Office notes that despite the transition of the state government and the PRPB Commissioner, progress towards improved compliance continues without hinderance.

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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-10; N=179), the Monitor's Office notes that the Commonwealth has maintained compliance during this reporting period. For example, 84 paragraphs met partial compliance and 8 paragraphs were rated not compliant during this reporting period, in comparison to 94 paragraphs rated as partially compliant and 19 as not compliant in CMR-10. Further, when reviewed comprehensively, almost 34% (N=60) of the paragraphs meet either substantial or full compliance in CMR-12 in comparison to 36% (N=64) in CMR-10. Several paragraphs were moved to deferred status during this reporting period.

In examining compliance more comprehensively across all 212 monitorable paragraphs in the Agreement, we find that full compliance improved by 9%, substantial compliance decreased by 11%, partial compliance decreased by 3%, and non-compliance decreased by 6% from CMRs 9 and 10 to CMRs 11 and 12.¹

Number of Paragraphs by Compliance Rating – Current vs. Previous

Number of monitorable paragraphs in the Agreement: 212

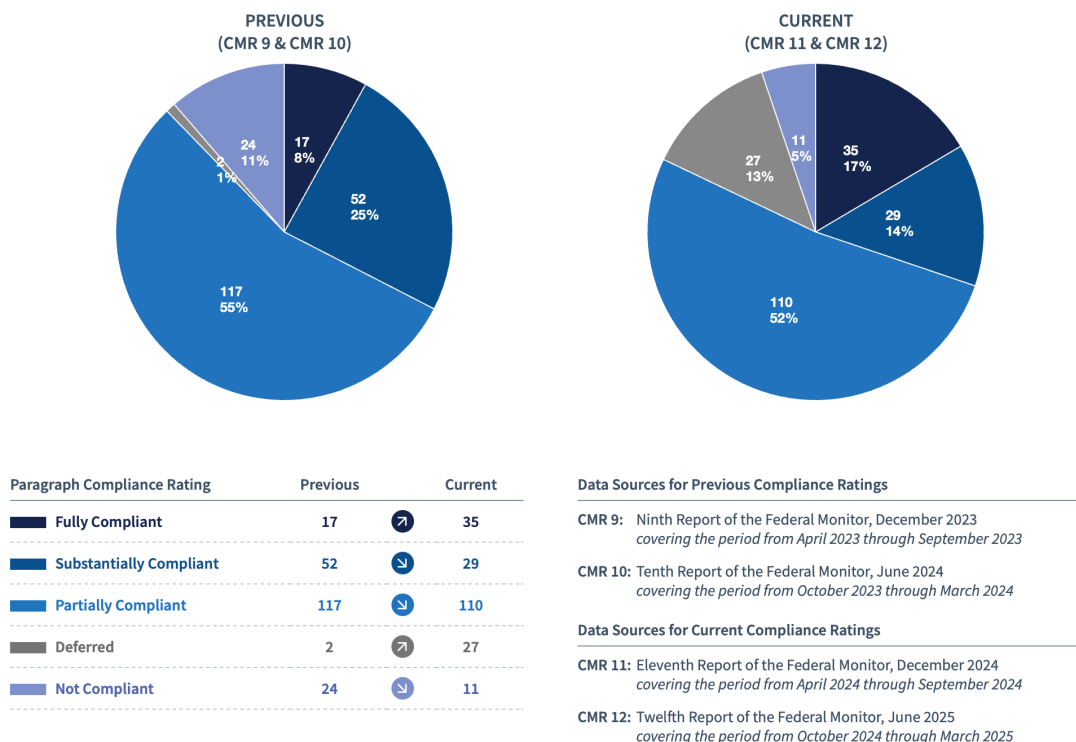


Figure 1. Rate of Compliance Over Time

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.

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Monitoring Activities During CMR-12

Over the past six months the Monitor's Office conducted five site visits to PRPB headquarters as well as various regions of the island including Ponce, Arecibo, and Mayaguez. 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 PRPB personnel leading and/or involved in various units such as Centro de Mando, Radio Control, Community Interaction Councils (CICs), Community Relations, and UOF.

These field visits provided 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 7,000 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 four system demonstrations on various systems including the Non-Punitive Discipline Module, PowerDMS, Inspections and Operational Audits Module, and Benchmark Analytics systems. The Monitor's Office also acquired access to these systems as part of its efforts to streamline monitoring efforts.

During the reporting period, the Monitor's Office reviewed 27 policies, forms (PPRs), and protocols under Paragraph 229 of the Agreement, including GO 113 (Force Investigations Unit (FIU)), GO 803 (Community Policing), GO 620 (Specialized Weapons), GO 801 (CICs), and GO 628 (Intervention with Persons in Crisis) among others.

The Monitor's Office also observed community engagement events hosted by PRPB and the CICs. Notably, the Monitor's Office conducted a community townhall meeting in Fajardo in January 2025 as part of its efforts to host meetings for the community each quarter. This meeting was largely positive and was attended by over 110 representatives from the community, PRPB, and the Department of Public Safety (DSP). Further, in effort to better understand and assist the specific needs of the LGBTQIA+ community, members of the Monitor's Office attended and observed various meetings between members of the LGBTQIA+ community and PRPB.

During this reporting period, the Monitor's Office participated in a December 2024 status conference focused on updates related to the CMR-11 report, the status of the current implementation and compliance plans that have been filled with the court, updates on the incoming and outgoing Transition Committees, the IT Corrective Action Plan (CAP), and the Commonwealth's Staffing Plan.

In collaboration with the Parties, the Monitor's Office drafted proposed revisions to the court approved methodology aimed at clarifying performance targets, adjusting targets to better reflect current and general policing practices, and revising data sources. Once approved by the court, these revisions will be implemented in the next reporting period.

Finally, the Monitor's Office continued its partnership with Gartner Inc. to support PRPB's efforts related to the Project Management Office (PMO) and the implementation of a new Records Management System (RMS). Progress was made in both areas as detailed in the [IT](#) section. This CMR delves into these developments throughout the report.

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Looking Forward to CMR-13

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 in-service training program, implementation of an RMS and EIS, and improved data analysis processes. The Monitor's Office stresses to the Commonwealth that as it achieves greater compliance levels, its ability to self-monitor and audit using reliable and valid data needs to be prioritized. Establishing the organizational structure within PRPB to do this work will be key in achieving full compliance, sustaining compliance, and ultimately meeting all requirements and ending this Consent Decree. The ultimate objective of the Agreement is to ensure PRPB has the processes, mechanisms, and systems in place to identify issues in policy, training, and practice and effect improvements to address or mitigate these issues while also ensuring accountability and transparency throughout the process.

The Monitor's Office will continue to review documents produced by PRPB and the Commonwealth in demonstration of compliance, conduct additional field visits, observe related training sessions, observe PRPB's community engagement efforts, and conduct interviews with both PRPB personnel and community stakeholders. Further, the Monitor's Office hopes to continue to conduct additional Townhall Community Meetings across the island to share the Reform status and hear 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

Since July 2022 PRPB has implemented its Provisional UOF Plan, which has resulted in improved UOF incident reporting. The Monitor's Office has determined that the Provisional UOF Plan has produced accurate numbers Bureau-wide. However, the plan will change with the introduction of PRPB's new records management system (RMS).

In addition, the Commonwealth's contractor, AH Datalytics, continues to help develop, maintain, and improve the various UOF related dashboards. This assistance provides the Reform Unit with the ability to comprehensively review whether certain procedural or documentary steps were taken as part of the force reporting process in the field. These data dashboards should also assist first-line supervisors with managing workflow and ensuring officer compliance.

During this reporting period, PRPB reported 1,315 instances of UOF in 625 incidents. A cross check of various units' data by the Monitor's Office determined the accuracy of the data and that the information from PRPB's Global Technology Enterprise (GTE) system is comprehensive. It should be noted that the Monitor's Office has determined that PRPB continues to make progress in the preparation and

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submission of UOF reports (PPR 605.1) in the timeframe outlined in PRPB policy. In the 98 UOF reports reviewed by the Monitor's Office, all but 1 (99%) were prepared and submitted in the timeframe outlined in policy. In addition, as outlined in the policy, supervisors completed their investigation within five business days. These improvements have resulted in continued positive compliance ratings.

It should be noted that 2,244 out of 2,311 (97%) officers from the rank of sergeant to colonel have received REA 601, which includes training on the investigation and review of UOFs. Most PRPB officers (96%) have completed the training.

Consistencies in the UOF data largely affect many of the paragraphs in this section. Other 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 PRPB's overall compliance with this section. As it relates to FIU, the Monitor's Office has observed that 100% of cases are completed within the modified timelines established during the prior two reporting periods. This updated 60-day requirement will continue. The additional personnel added to FIU also have and will continue to contribute to improved compliance.

While the Monitor's Office's past reviews of Commissioner Force Review Board (CFRB) evaluations found that the evaluations were objective, they were not timely. To address this issue during the reporting period, PRPB modified the process by updating and creating new forms associated with the FIU (PPR 113.1 through PPR 113.12). PRPB has also created new forms, PPR 502.7 (Review of Field Investigations of UOF Incidents Investigated by the Use of Force Investigations Division) and PPR 502.8 (Final Determination of the Incident).

To address the backlog of cases with the CFRB for review, PRPB created additional temporary boards headed by board members from the original CFRB who had received training on GO 502 (Force Review Board) and designated them as presidents of these newly formed boards. The remaining members of these boards were drawn from the area commands' command staff who had also received training relating to serving on the board. PRPB indicated that the existence of these boards was for the sole purpose of reducing the backlog of cases and as such have reverted back to one CFRB as noted in the prior CMR.

Adding to the extensive workload currently undertaken by the CFRB is the sheer volume of investigations completed by FIU during the reporting period. The Monitor's Office was able to attend multiple CFRB meetings during the reporting period and determined that the CFRB is properly evaluating FIU investigations within the timeline established by policy. The CFRB now has a dedicated office outfitted with computers and has an officer assigned as the clerk of the board with the responsibility of preparing cases for board members and scheduling meetings.

It is critically important to have CIT trained officers throughout the 13 area commands. Since the conclusion of the pilot project in November 2020, PRPB had lagged in expanding its CIT coverage Bureau-wide. However, PRPB made significant progress in the prior three reporting periods and now has

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coverage in all 13 area commands. By the end of the current reporting period PRPB had 279 trained CIT officers, 262 of which are assigned to patrol/CIT functions (90%) in the 13 area commands.

PRPB also appointed a new CIT Bureau Coordinator in early 2024 who holds the rank of inspector to lead the expansion efforts. The assigned inspector has experience in this area, holding a doctoral degree in psychology.

Notwithstanding the challenges noted above, the Commonwealth has demonstrated progress in many of the UOF paragraphs. Much of the efforts made in this reporting period can be attributed to PRPB's continued collaboration with AH Datalytics, the Commonwealth's contractor, who has helped PRPB develop and maintain several UOF related dashboards, which include "Compliance with Reports", "Use of Force Statistics", "Requests from the Monitoring Team", and "Specialized Tactical Unit Mobilizations." These dashboards are useful to the Monitor's Office as they serve as another tool in assessing PRPB's compliance with the Agreement. In addition, PRPB's efforts in training members as CIT officers and in expanding the CIT Program to all area commands have been identified by the Monitor's Office as major steps. The positive efforts made in this reporting period have proven beneficial in increasing PRPB's compliance in this section.

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-11, 25% of paragraphs (9 paragraphs) were assessed as partially compliant and 64% (23 paragraphs) were assessed as substantially compliant, in comparison to the current reporting period, where 19% of paragraphs (7 paragraphs) were found to be partially compliant and 53% (19 paragraphs) were found to be substantially compliant. Ten paragraphs (28%) were rated as fully compliant in comparison to four (11%) in CMR-11. See figure 2.

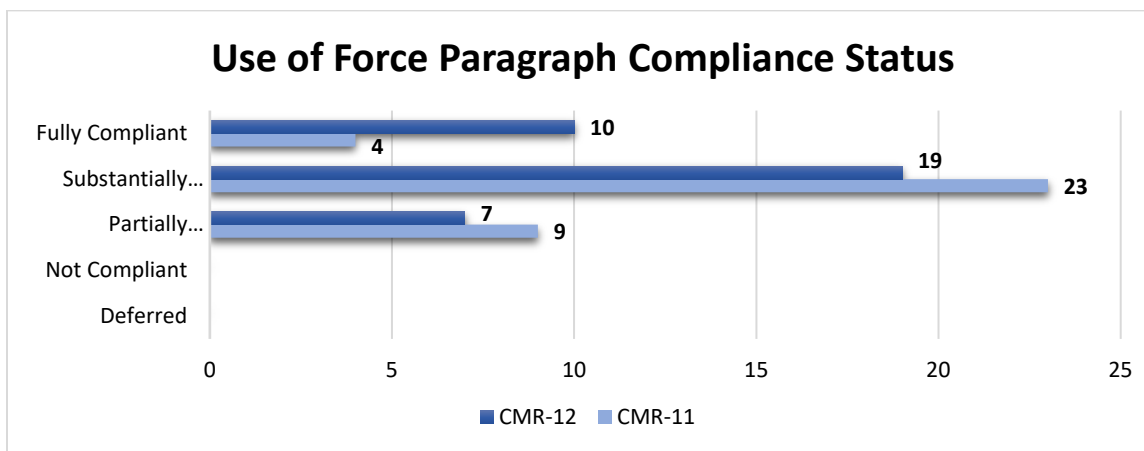


Figure 2. Use of Force: Paragraph Compliance Status

2. Searches and Seizures

PRPB officers are making progress in articulating probable cause (PC) in police reports. However, some arrest and search files continue to lack necessary documentation, such as the police report, the search

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consent form, and in many cases, the seized property/evidence form. Improvements are needed in the recording and storage of seized property and evidence, as many evidence rooms do not have adequate space and ventilation to properly preserve evidence, which can compromise evidence preservation. Some officers working in evidence rooms have expressed health concerns due to insufficient ventilation.

Preliminary data indicated a positive trend toward eliminating boilerplate, conclusive, and repetitive language in reports. PRPB supervisors are increasingly responding to arrest scenes, reviewing arrests, conducting inspections, and attending to the needs of arrested individuals in police facilities.

The review and approval for search warrant applications, affidavits, and arrests are also trending positively. Most officers are correctly completing consent search forms. However, the collection of demographic and geographic data is on hold pending the implementation of proposed automated systems in 2025, according to PRPB's Search and Seizure Implementation Plan.

To enhance compliance, PRPB should ensure that final submissions of arrest and search files are thoroughly inspected and audited before being submitted to the Monitor's Office.

Overall, the Commonwealth's compliance with the 18 paragraphs assessed during this reporting period within Searches and Seizures reflects a regression in levels of compliance to what was noted in previous CMRs. In CMR-10, 56% of paragraphs (10 paragraphs) were assessed as partially compliant and 33% (6 paragraphs) were assessed as substantially compliant, in comparison to the current reporting period, where 67% of paragraphs (12 paragraphs) were found to be partially compliant and 11% (2 paragraphs) were found to be substantially compliant. Five paragraphs (28%) were rated as deferred. See figure 3.

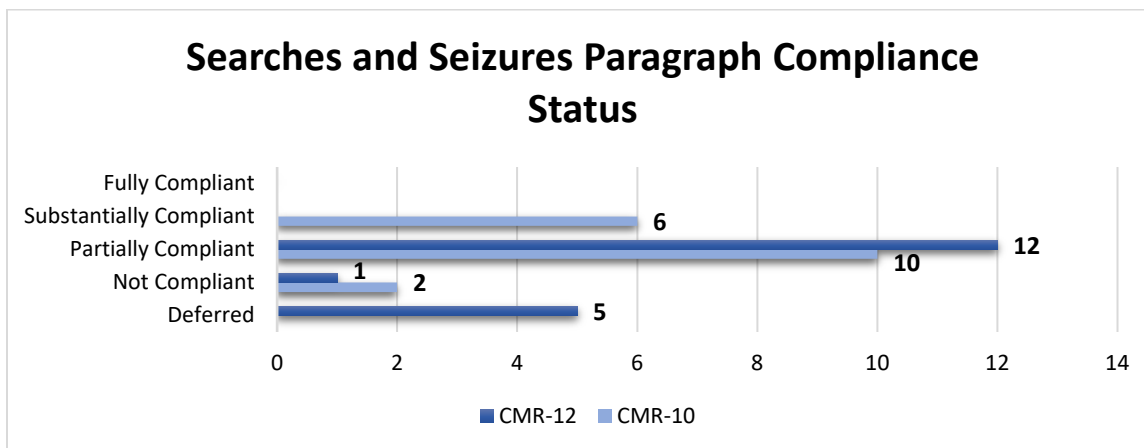


Figure 3. Searches and Seizures: Paragraph Compliance Status

3. Equal Protection and Non-Discrimination

In this reporting period, only ten specific paragraphs—84 through 86, 88 through 90, 92, 93, 96, and 99—were subject to evaluation. These sections are typically reviewed on a semiannual basis, with particular targets assessed during each cycle. The current CMR highlights the bolded compliance targets. A full comprehensive assessment of this Section will be conducted in the next CMR. The areas of focus during this reporting period center on PRPB's progress in training and policy implementation related to

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recruitment, performance evaluations, juvenile case documentation, hate crime reporting, and instruction on bias-free policing.

The Parties continue to collaborate under the framework of the Sexual Assault and Domestic Violence (SA/DV) Plan. This framework has played a pivotal role in addressing a wide range of issues, including updates to training content, improvements in investigative file quality, the adoption of victim-centered approaches, enhanced supervisory oversight, refinements to internal investigative processes, and staffing and resource allocation.

The designated workgroup remains engaged in executing the tasks outlined in the SA/DV Plan, which PRPB developed to guide improvements. As part of this effort, an investigative checklist has been created to support consistency and quality in case handling. The group continues to respond to observations and suggestions made in earlier CMRs, with the overarching goal of strengthening investigative practices in SA and DV cases. An essential element of this initiative is the ongoing development of specialized training for personnel to ensure a prompt and effective initial response to gender-based violence. As a result of these efforts, PRPB has achieved a 95% compliance rate in Gender Violence training. However, other areas—such as hate crime and NIBRS training—are still being developed. PRPB acknowledges that maintaining a long-term commitment to providing accessible training, adequate support, and necessary resources is critical for effectively addressing and investigating these complex and sensitive cases.

Overall, the Commonwealth's compliance with the 10 Equal Protection and Non-Discrimination paragraphs reflects the same progress in levels of compliance to what was noted in previous CMRs. In CMR-10 60% (6 paragraphs) of the 10 paragraphs assessed were partially compliant, in comparison to the current reporting period, where 60% of the 10 paragraphs (6 paragraphs) were found to be partially compliant and 10% of the 10 paragraphs (1 paragraph) was found to be substantially compliant. See figure 4.

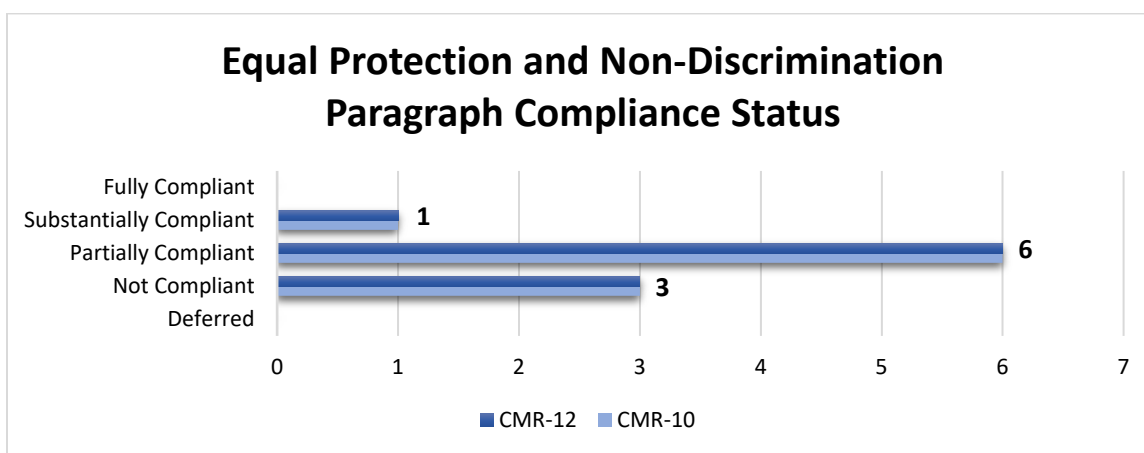


Figure 4. Equal Protection and Non-Discrimination Paragraph Compliance Status

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4. Recruitment, Selection, and Hiring

The Monitor's Office last assessment of Recruitment was published in CMR-10 where all paragraphs were rated as partially compliant. The updated GO 501 for Recruitment was updated and published in December 2024. The 2025 Annual Recruitment Policy is still being developed and reviewed by the new Commissioner and PRPB leadership.

One area requiring improvement is recruitment training. PRPB must submit the training curriculum to the Monitor's Office for review prior to its approval. A Recruitment Training course is scheduled for May 2025 for Recruitment Office personnel. PRPB will be in a better position to achieve substantial compliance when course materials are reviewed by the Monitor's Office and the training is delivered.

The Monitor's Office requested 56 candidate background files from Class 235, including a polygraph exam, credit history, criminal history, psychology test, and medical test, among others. PRPB submitted the 56 files requested, and the Monitor's Office found the files to be partially compliant with the requirements of Paragraphs 104, 107, and 108. PRPB still faces a shortage of polygraphers, which hampers the recruitment process. Once the polygraphers are trained, PRPB should be able to handle the high volume of candidates expressing interest in joining the Bureau.

The Monitor's Office has determined that PRPB continues to be partially compliant with the area of Recruitment, Selection, and Hiring. PRPB is in the process of recruiting qualified personnel and has developed a 2025 Strategic Recruitment Plan that has inclusive selection practices reflecting PRPB's diverse population. PRPB has shown signs of improvement in certain areas, such as reporting that a recruitment course will be created and offered during 2025.

Recruiting, selecting, and retaining personnel are pivotal for community policing and for the policing profession in general. Despite nationwide staffing challenges in law enforcement, PRPB has demonstrated a concerted effort to attract and thoroughly vet candidates. During the most recent recruitment meetings in January and February 2025, it was affirmed that PRPB currently has 492 police cadets in training for Class 235.

PRPB continues to use the INTERBORO platform for its recruitment processes, and PRPB has reported that the platform is useful. However, with the recent acquisition of solutions offered by Benchmark Analytics that will be Bureau-wide, the Monitor's Office is unsure whether this platform will remain or be replaced. Any change in the platform should proceed without delays affecting the recruitment process.

Under Puerto Rico law, cadets are now permitted to enter the Academy at age 18. These cadets will not be commissioned until after they complete the Academy and have been awarded an associate's degree by Ana G. Méndez University. They are given up to three years from the time they enter the Academy to meet these requirements. Once they have graduated from the Academy and possess an associate's degree, they may be commissioned as officers.

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Overall, PRPB's compliance with the eight Recruitment, Selection, and Hiring paragraphs assessed during this reporting period reflect the marginal levels of compliance improvement as what was noted in previous CMRs. In CMR-10, all paragraphs (8 paragraphs) were assessed as partially compliant, in comparison to the current reporting period, where 88% of paragraphs (7 paragraphs) were found to be partially compliant and 12% (1 paragraph) were found to be substantially compliant. See figure 5.

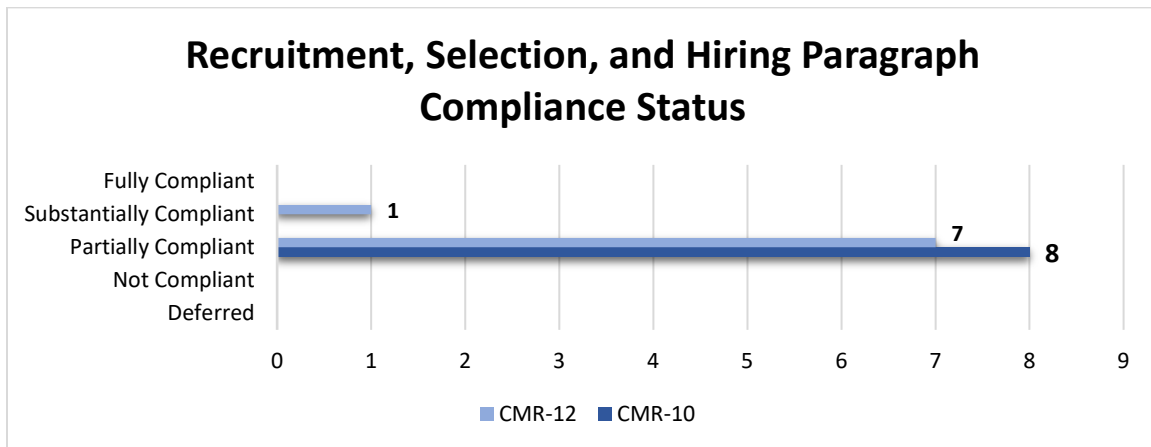


Figure 5. Recruitment, Selection, and Hiring: Paragraph Compliance Status

5. Training

During this reporting period, PRPB continued to make meaningful strides in strengthening its training systems, demonstrating a strong commitment to reform and sustainability. Significant improvements were observed across pre-service, field training, and in-service training programs, particularly in curriculum alignment, instructor quality, and training delivery. Pre-service training at the Academy remains policy-driven and is effectively conducted by qualified instructors, with action collection and review of cadet feedback. PRPB is also exploring expanding online learning opportunities to modernize its training approaches.

As part of the Monitor's Office's review, focus groups were conducted with Training Coordinators from six policing regions (Mayaguez, Carolina, Bayamon, San Juan, Ponce, and Guayama) covering key areas such as policy development, procedural adherence, training standards, assessment tools, centralized management of training records, core curriculum implementation, and the use of equipment and technology guidelines. These discussions revealed a growing alignment between regional practices and SAEA's centralized training framework, reinforcing the structural integrity of PRPB's overall training system.

The Field Training Officer (FTO) Program continues to be one of PRPB's strongest areas, nearing full compliance across in almost all relevant paragraphs. PRPB updated GO 701 (FTO), implemented a refreshed FTO training course, and maintained a robust evaluation and supervision framework to ensure the quality of both field training officers and apprentice agents.

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In-service training structures are beginning to take shape with better policy alignment, improved attendance rates, and early efforts toward specialized training tracks for different ranks and units. However, PRPB must continue to strengthen formal training needs assessments, better integrate stakeholder feedback, and ensure roll call trainings are fully tracked and credited under formal systems.

Finally, PRPB is making important advancements in training record management through its transition to the Benchmark Analytics platform. This system is expected to significantly improve the accuracy, tracking, and accessibility of training data. While some areas require continued focus, PRPB's overall progress in training reflects a steady, organized, and reflective trajectory toward full compliance.

Overall, PRPB's compliance with the 18 Training paragraphs assessed during this reporting period reflects similar levels of compliance compared to what was noted in previous CMRs. In CMR-10 66% of paragraphs (12 paragraphs) were assessed as partially compliant and 11% of paragraphs (2 paragraphs) were assessed as substantially compliant, in comparison to the current reporting period, where 56% of paragraphs (10 paragraphs) were found to be partially compliant and 11% of paragraphs (2 paragraphs) were found to be substantially compliant. Five paragraphs (28%) were rated as fully compliant. See figure 6.

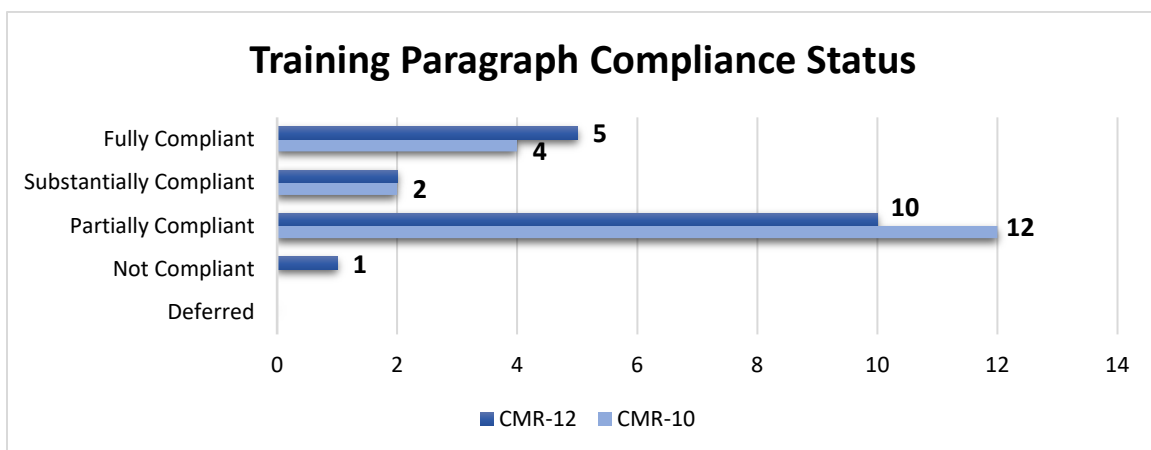


Figure 6. Training: Paragraph Compliance Status

6. Supervision and Management

The Commonwealth continued to demonstrate improvement toward compliance in this section of the Agreement. As reported in prior CMRs, PRPB has made progress in promotions, implemented a new evaluation system, and assigned promoted first-line supervisors. Additionally, during this reporting period, PRPB announced that AH Datalytics, the Commonwealth's contractor, has developed a dashboard to track performance evaluations, training, monthly academies, non-punitive corrective measures, and referrals to SARP and psychological services. Furthermore, AH Datalytics is developing another dashboard to validate supervisor and agent assignments.

PRPB projected that the Early Intervention System (EIS) provided by Benchmark Analytics will go live between September and December 2025. These accomplishments represent significant progress in this area. PRPB also reported that the EIS Charter has been submitted for review and that the project scope has been presented to the IT Governance Executive Committee, including Puerto Rico Innovation and

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Technology Service (PRITS) representatives. Furthermore, PRPB reported progress in preparing the required datasets for the initial data import into the EIS. Ongoing sessions are being conducted with the Policies and Procedures team, the EIS Unit, and the Benchmark Analytics team to draft the policy and procedures for the EIS. The Monitor's Office stresses to the Commonwealth that it must incorporate an internal communication strategy to inform PRPB members of EIS, its objective, and related policies.

Despite these valuable accomplishments, PRPB continues to face challenges in supervisory accountability, the development of the EIS, and providing comprehensive personnel records and statistical data. Addressing these issues effectively and consistently will be crucial for PRPB to close the gap and achieve substantial compliance

The reported promotions at all levels of supervision during prior reporting periods bring PRPB closer to meeting the number of supervisors outlined in the Staffing Plan. The Monitor's Office recognizes that a number of supervisors have either retired or resigned, leading once again to a shortage of first-line supervisors. It is recommended that PRPB conduct an audit of first-line supervisors who have left the Bureau or are eligible for retirement within the next two years. Based on this data, PRPB should begin preparations for offering the sergeant's test by early 2026. While current deficiencies are relatively low, they nonetheless represent a concern.

Additionally, it was reported that training on inspections and audit systems for the Inspection Division has concluded and was submitted for review to all parties on February 22, 2025. The Monitor's Office finds that the related policies and training on internal audits and inspections align with approved policies. The Inspection Division has also provided information and documentation demonstrating that audits are consistently planned and conducted. However, documentation proving that the Commissioner reviews each audit is still lacking. The Inspection Division is actively working on producing reports to demonstrate that the Commissioner or his/her designee reviews all audits for policy compliance, disciplinary measures, and/or non-punitive corrective action.

As reported in several CMRs, ongoing concerns regarding the Transfer Unit, assignments, evaluations, vehicle shortages, and limited budgets for vehicle repairs continue to be raised and confirmed by management. Human resources personnel and high-ranking officials have acknowledged these issues and indicated that they are actively developing plans and systems to address them. PRPB has demonstrated a commitment to resolving these concerns, particularly through the implementation of roll call meetings. However, proper documentation of these meetings remains insufficient. The improvements in this area can be attributed to the increase in new supervisors, as well as PRPB management's directive to mandate roll call meetings. PRPB should continue advocating for training meetings and roll calls, ensuring that a system is in place to document and codify these practices in policy.

PRPB implemented a new evaluation policy in January 2024, and over 95% of supervisors have completed the designated training curriculum, positioning PRPB for potential substantial compliance. During the January 2025 evaluation cycle, a review of 90 evaluation records provided by PRPB showed that supervisors have significantly improved in performance evaluation preparation and score justifications. However, interviews conducted in January and February 2025 revealed that 35% of personnel had not met with their supervisors to discuss their evaluations or career development and 10% of personnel reported that they were only asked if they agreed with their evaluation. This demonstrates that the training and related policy are not being operationalized in practice as required.

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These issues were verified during high-ranking officers' meetings, with the primary reason cited being a lack of supervisors. The primary reason cited by supervisors was a lack of time to conduct these meetings. It is essential that supervisors understand the importance of these discussions for morale and career development. Recently promoted supervisors received in-person training on performance evaluations; further comprehensive training for all supervisors is advised, emphasizing compliance and importance.

Interviews also revealed that some evaluations were conducted by supervisors who did not directly oversee the evaluated employees or worked on different shifts than the personnel they assessed. Additionally, acting supervisors continue to be used for supervisory duties, although these deficiencies were reported in only 10% of interviews. The technological improvements supporting the new performance evaluation system is detailed in the IT section of this CMR.

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-10, 50% of the 24 paragraphs (12 paragraphs) were assessed as partially compliant and 33% of the 24 paragraphs (8 paragraphs) were assessed as not compliant, in comparison to the current reporting period, where 50% of the 24 paragraphs (12 paragraphs) were found to be partially compliant and 4% of the 24 paragraphs (1 paragraph) was assessed as not compliant. Four paragraphs (17%) were assessed as fully compliant and 29% (7 paragraphs) were assessed as deferred. See figure 7.

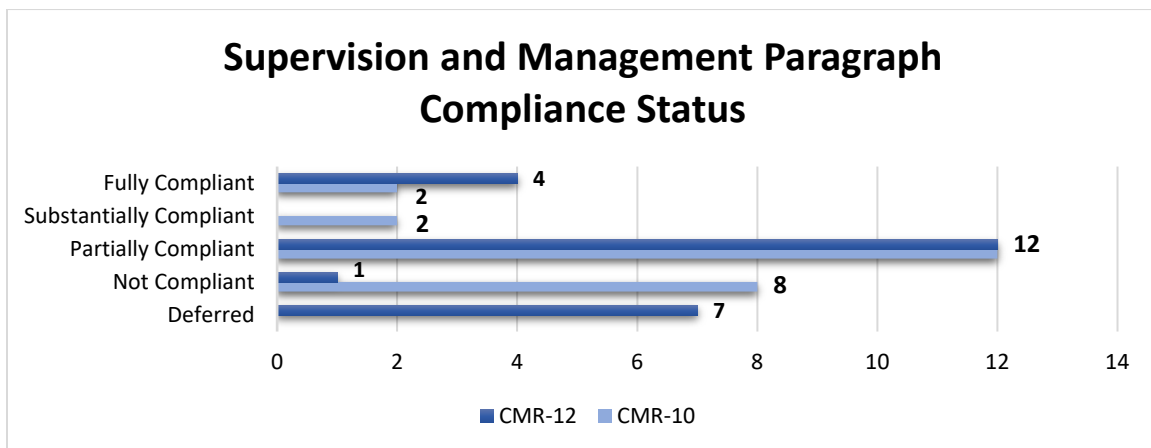


Figure 7. Supervision and Management: Paragraph Compliance Status

7. Civilian Complaints, Internal Investigations, and Discipline

For this reporting period, the Monitor's Office found that PRPB continues its efforts to improve compliance in multiple areas, while continuing to struggle with two main issues: insufficient resources and the use of proper investigative techniques and tools. While the analysis of the random sample of SARP investigative files resulted in low levels of compliance, other cases demonstrated improvements in SARP investigative practices. The evidence is clear - in areas where PRPB and DSP have aligned necessary resources, measurable progress has invariably followed. However, the continued lack of key resources and several policy and practice changes undermine PRPB's compliance levels.

Most of the SARP investigative cases adjudged as not compliant were due to the absence of a separate, concurrent administrative investigation in cases where a PRPB officer had been accused of criminal

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wrongdoing. Others relate to the unacceptable practice of assigning an Internal Affairs (criminal) investigator to also investigate cases administratively. PRPB has been repeatedly cautioned over the past several years concerning this practice. Unfortunately, the practice continues unabated and bars further gains in compliance.

PRPB readily acknowledges that it does not conduct simultaneous administrative investigations of alleged criminal behavior by officers. PRPB points to their current version of SARP procedures that seemingly forbids them from embracing this part of the Agreement – despite the fact that the same Agreement requires simultaneous investigations. While SARP leadership promises that they will conduct concurrent investigations upon the issuance of a modified GO, such GO has been circulating since September 2024 without the required signature by the new Police Commissioner.

As is the case in all CMRs, the Monitor's Office has interviewed various members who actually conduct, supervise, oversee, and direct internal police investigations. Presently, the Monitor's Office has interviewed every SARP investigator at least once - with the majority sitting for two or three separate interviews over the past five years. With this full data set, certain trends and problems come into sharper focus.

The Monitor's Office remains concerned about the workload of SARP investigators, many of whom have reported active SARP administrative caseloads in the double digits. This is worrisome in light of the 90/90-day rule for completion of a SARP administrative investigation. The Monitor's Office sees PRPB struggling to keep the administrative timeframe mandated by the Agreement for both investigations and subsequent adjudications. Notwithstanding PRPB's efforts, the Monitor's Office has seen recent evidence of more than three dozen current and active SARP internal administrative investigations that have greatly exceeded the 180 (90+90) day rule for completion. Even more concerning as of the end of the reporting period, 9 of these investigations remain incomplete despite the passing of over 6 months since the original 180-day deadline passed. No reasons were cited for these delays in the data provided.

In what could be interpreted as effort to spread SARP case workload across the island, the Monitor's Office has heard of and seen internal investigative cases from the San Juan Metropolitan area assigned across the island, including to its most remote western points located a substantial distance away from the metro region. The majority of SARP cases originate in the island's population centers, including San Juan, Bayamon, and Carolina, with fewer cases originating in Ponce, Mayaguez, and Aguadilla.

In a limited number of these internal cases, an investigator from outside the area may be required to avoid potential conflicts of interest or other conflicts. Five years of review reveals that ethical dilemma cases are the exception, not the rule. Through their efforts to balance case distributions and SARP workloads across the island, PRPB has exposed the core problem – some internal investigators are assigned to outlying SARP offices where far fewer complaints are normally received. When these underused investigators are re-tasked to the other side of the island, they often commute for hours in a vehicular fleet that is only now beginning to approach some level of sufficiency and roadworthiness.

SARP investigators from the west are challenged with managing cases located far away from their workplace. They describe coordinating in-person interviews in other parts of the island, securing dependable transportation to these sites, and the lost time spent driving to these sites – often with

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traffic delays – as a significant challenge. While the assigned vehicular fleet has actually improved in some SARP dependencies, some SARP investigators describe having to completely avoid the toll highway system and rely on secondary and back roads. According to these investigators, while multiple new cars were delivered many months ago – some of these cars still lack a highway toll transponder.

Due to the adverse impact of assigning metropolitan administrative cases to the west of the island, the Monitor's Office strongly recommends that any SARP commander considering such an assignment take into account the investigators' travel time to the location, the present state of their caseload, the sufficiency and safety of their transportation, the estimated amount of time to be spent away from their assigned area, as well as the number and type of cases currently assigned to that officer. To assign a case located hours away to an investigator carrying a full caseload of 12 or more SARP cases, each with an individual 90+90-day deadline, is both counterproductive and imprudent.

The Monitor's Office understands the dilemma of workplace assignment challenges especially in geographically larger state police agencies, which unlike municipal and most local or county agencies, cover a far more extensive geographic area. That said, PRPB should consider reassigning SARP investigators closer to where the work is actually concentrated, namely the San Juan Metropolitan area ranging from Arecibo to Fajardo and reaching down as far as Caguas. The Monitor's Office also urges caution in assigning new SARP investigators to places that lie well outside of this defined area of higher reporting. PRPB's first priority should be to match resources with area workload, not matching prospective investigators with their preferred area assignments.

Another area that bars further compliance progress concerns Internal Affairs. In the random sample of cases reviewed, one current case exemplifies this problem, which has been frequently restated in multiple past CMRs. In this latest case, plainclothes Internal Affairs investigators were repeatedly assigned to surveil an officer accused of criminal wrongdoing while on duty. The suspected officer's workplace was located in the very same facility as that of the IA investigators. It is not hard to imagine the plight of these surveillance officers leaving the confines of this police area, attempting to surveil a member of PRPB who not only knows who these officers are, but also the confidential surveillance vehicle they operate. To no one's surprise, surveillance in this case was unproductive. Accordingly, PRPB will fail to advance in this area until Internal Affairs Units are relocated into adequate non-police facilities that are not adjacent to active police installations.

PRPB continues to remain non-compliant with respect to the Garrity Rule, which unfortunately has been misapplied repeatedly for well over a year. This non-compliance is evidenced by Internal Affairs (criminal) investigators frequently misusing this tool, which was designed for the use of administrative investigators and administrative investigations. Recently, in an attempt to assist PRPB in curing this lingering defect, the Monitor's Office designed and delivered a short course on the proper use of Garrity to the entire SARP command staff. The Monitor's Office is now more confident that SARP command has a deeper understanding as to how the rule must be applied and the serious consequences resulting from misapplication of this rule. The Monitor's Office expects to see significant effort by PRPB to properly apply the rule in the future.

The Office of Legal Affairs (OAL) lawyers are essential to PRPB's mission of internal discipline. OAL lawyers are responsible for adjudicating internal cases of serious wrongdoing investigated by SARP. In

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the last CMR, the Monitor's Office was pleased to report that OAL was fully staffed with lawyers – although still lacking support staff. While OAL was mostly satisfactory in the last CMR, the Monitor's Office was informed that the office recently lost four of its assigned lawyers. Two lawyers were reassigned to the Reform Office and two were reassigned to DSP. This repeats a revolving-door situation from the past where adjudicating cases and notifying parties within 30 days was impossible to accomplish. It took nearly two years and multiple CMRs for DSP to staff OAL with a sufficient number of lawyers. Less than a year later, the office is returning to the status quo ante - not enough legal personnel to handle their caseload.

Overall, the Commonwealth's compliance with the 46 paragraphs assessed during this reporting period within Civilian Complaints, Internal Investigations, and Discipline reflects similar levels of compliance with what was noted in previous CMRs. In CMR-11, 57% of paragraphs (26 paragraphs) were assessed as partially compliant and 11% (5 paragraphs) were assessed as substantially compliant, in comparison to the current reporting period, where 54% of paragraphs (25 paragraphs) were found to be partially compliant and 11% (5 paragraphs) were found to be substantially compliant. See figure 8.

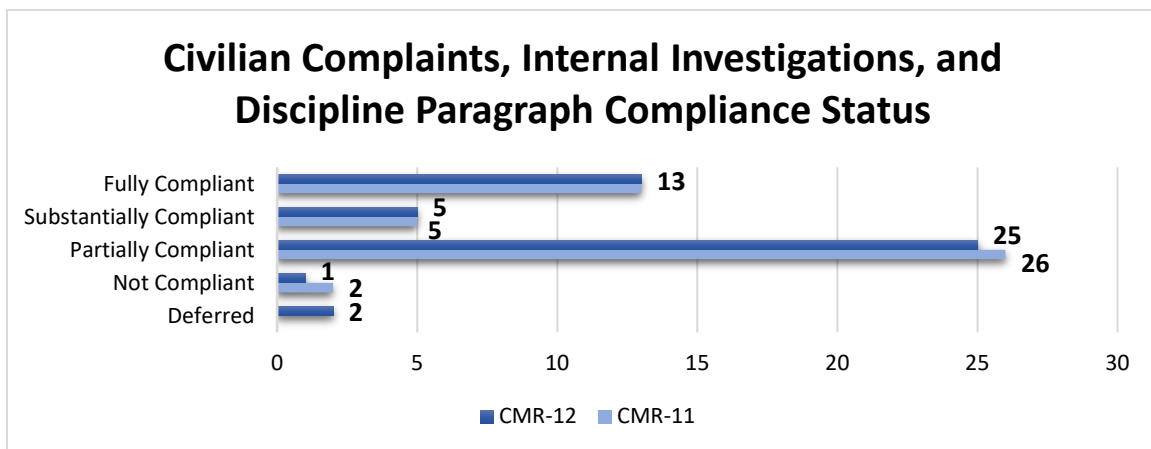


Figure 8. Civilian Complaints, Internal Investigations, and Discipline: Paragraph Compliance Status

8. Community Engagement and Public Information

On September 18, 2024, the court approved a new methodology to streamline processes and align with PRPB's implementation of improved administrative and operational practices. As a result, some paragraphs and compliance targets moved to an annual assessment frequency. Consequently, the Monitor's Office adjusted all annual paragraphs to be reviewed during the same CMR reporting periods. Therefore, all annual paragraphs are now assessed during odd reporting periods (October 2024 – September 2025). This report serves as an interim assessment and review of the paragraphs within this area of the Agreement.

Under the new court-approved methodology and the Monitor's Office's oversight, compliance is measured by PRPB's ability to establish a Bureau-wide community engagement plan and supplemental area command needs-based program plans developed in close collaboration with CIC and other community stakeholders. The plans should outline how PRPB will integrate the community and problem-

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solving principles into its management, policy, and procedures, including resource deployment and accountability systems.

During this reporting period, PRPB submitted an initial draft of its Bureau Community Engagement Plan for review. As part of this, the Monitor's Office and the Community Engagement Working Group had several discussions to review and provide feedback on the initial plan and outline the scope of the Area Command Community Engagement Plans. As of the end of this reporting period, no further drafts were received. The Monitor's Office looks forward to reviewing further drafts of both plans during the next reporting period. Further, the Monitor's Office notes that the approval of community policing policies, related GOs for CICs, the ancillary CIC Rules and Regulations Manual, and the policy for community open meetings (Encuentros Comunitarios) are overdue and were not approved and signed by the Commissioner during this reporting period. It was also confirmed that Benchmark Analytics, as part of its contract with the Commonwealth and PRPB, will implement a new community policing electronic module system to extend data collection systems to CIC engagement, open meetings (Encuentros Comunitarios) activities, the integration of the Press Office into community policing and public information practices. These developments aim to create a proactive control and monitoring process to meet Agreement requirements effectively and efficiently.

To review compliance during this reporting period, the Monitor's Office sampled the police areas of Mayaguez, Ponce, Humacao, Aguadilla, and Arecibo, and interviewed PRPB members directly involved in community policing and outreach at various levels within the districts, precincts, area coordinators, and area commands. Interviewees included area command personnel, community safety council (CSC) members, civilians, facilitators, and representative CIC members within the sampled police areas. Additionally, the Monitor's Office reviewed GOs 801 (CICs), 803 (Community Policing), and 805 (Community Meetings) and the CIC Rules and Regulations Manual; attended various CIC Central committee meetings, the Safety Fair held at Plaza Las Americas during Police Week, and the CSC Encounter held in Aibonito.

Further supplementing the information gathered in the above reviews and interviews, the Monitor's Office sponsored a Townhall Meeting held in Fajardo and through joint efforts with PRPB. Over 150 community members and stakeholders including CSCs, representatives from various municipalities, non-profit organizations, direct services providers, CIC members from Fajardo and Utuado, along with the committee's spokespersons from Ponce and Bayamon attended these meetings. The Honorable Francisco A. Besosa, U.S. District Judge for the District of Puerto Rico, addressed the group along with PRPB's Commissioner, and USDOJ representatives.

The Monitor's Office notes that the evidence submitted by PRPB to determine compliance during this reporting period revealed no major changes or significant improvements compared to prior reporting periods, specifically related to those paragraphs with methodologies that have remained unchanged. Although the Monitor's Office is encouraged by the milestones PRPB has reached in refining administrative and technological practices, the comprehensive implementation of community policing in practice has encountered considerable delays, including pending procedural reviews and decision-making processes, which hinder fulfilling the Agreement's requirements. These practices encompass supporting evidence in alignment with 1) recruiting a diverse and representative workforce with

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community participation through CICs; 2) performance appraisals; 3) personnel deployments in response to community engagement efforts; 4) collaborative problem-solving activities through the implementation of the SARA Model; 5) meaningful outreach activities aimed at community education, prevention, and awareness; and 6) improving the community's quality of life through strategic and structured planning for meaningful community interactions including community open meetings or initiatives classified as Encuentros Comunitarios.

As noted above, due to the September 2024 court approved methodology change to streamline processes and align with PRPB's implementation of improved administrative and operational practices, some paragraphs and compliance targets moved to an annual assessment frequency. Consequently, the Monitor's Office adjusted all annual paragraphs to be reviewed during the same CMR reporting periods. Therefore, all annual paragraphs are now assessed during odd reporting periods (October 2024 – September 2025), which prevents the Monitor's Office from being able to provide a compliance comparison. This report serves as an interim assessment and review of the paragraphs within this area of the Agreement. See figure 9.

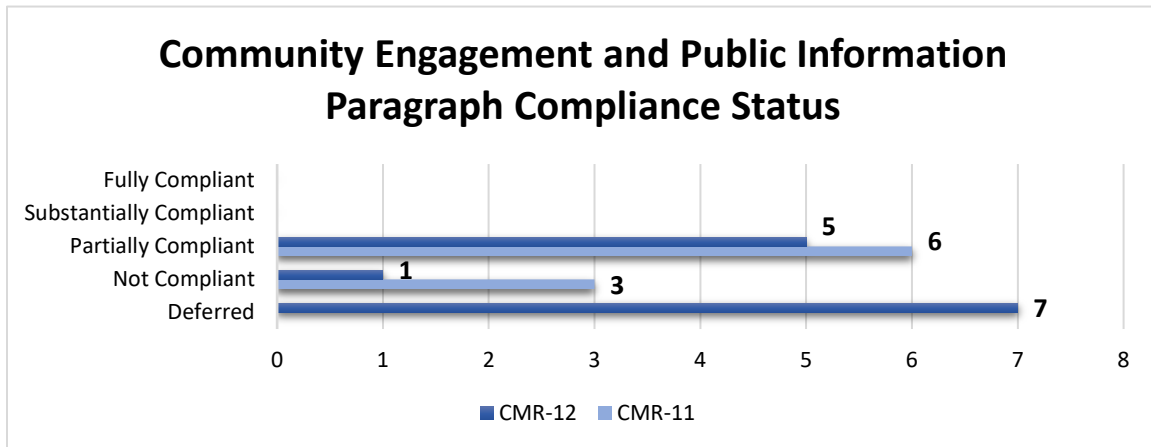


Figure 9. Community Engagement and Public Information: Paragraph Compliance Status

9. Information Systems and Technology

Throughout the reporting period the Commonwealth continued to improve its ability to address IT challenges (Paragraphs 218 through 223). While there are no changes in compliance ratings due to ongoing implementation of the Axon RMS and Benchmark Analytics modules, to which the Parties and the Monitor's Office have agreed, PRPB's improving capacity to act has resulted in a positive impact to the Commonwealth's efforts to implement the RMS replacement and EIS. Notably, staffing of the Program Management Office (PMO) with key contractors has been significant to the BT's ability to manage. This commitment to subject matter experts must continue in order for PRPB to succeed, manage risk, and sustain itself.

PRPB's focus on management details, resources, rigor, planning, and the IT Corrective Action Plan (CAP) are commendable. As recently as November 2024, management tracking and establishment of artifacts showed marked signs of improvement due to the standup and staffing of the PMO. In December 2024,

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subject matter experts from Gartner Inc. noted that the ongoing implementation with Axon was positive. Emphasis and focus on the Axon and Benchmark Analytics modules are warranted and supported by the Monitor's Office. BT's continuous focus and dedication is required to maintain management acumen in order to address the risks and challenges they will face throughout system implementation.

NCIC doctrine is being addressed resulting in compliance trending towards partial compliance during the next reporting period. In accordance with the IT CAP, radio inventory has been stabilized, and minimums have been achieved. The PMO is established and improving planning and execution. Overall, the BT has raised its activity level and is focused on solution development. On-site working sessions with Axon were well supported. This significance should not be underestimated.

With the arrival of a new Commissioner, PRPB has the opportunity to continue to "raise the bar" with regard to its practices, acumen, and pursuing improvement in every facet of its IT enterprise including development, solutioning, training, design, oversight, planning, etc.

Summary of Concerns

Improved information sharing should be more proactive. USDOJ noted that information available and status of the Benchmark Analytics acquisition from the Commonwealth was inadequate, which led to multiple meetings to address the lack of clarity around teaming and contracting.

Field operational use of IT and the infrastructure are often considered to be adequate. During the reporting period, power outages and system updates impacted availability. Lack of visibility into technology planning was an operational concern as recently as January 2025, both in the field and at the Academy.

Further, although the BT continues its efforts to work around training shortcomings by doing on-the-job training, the obligations of SAEA to conduct institutional and refresher training should be revisited and codified in policy as soon as possible to support the ongoing staffing assessment. The continuing lack of direct SAEA support should be viewed as an enterprise concern requiring top-down leadership intervention. Robust and available training is important to gaining IT buy-in both at HQ and in the field. If left unaddressed, frustration and resistance to IT is likely.

Looking Forward

With a new Commissioner, PRPB has the opportunity to be forward thinking and lean into its efforts to transparently communicate, publish status, and build the view of IT as an enabler. To be credible, use cases regarding operational technology must be proofed and data demonstrated. Without proofing, compliance cannot be achieved or evaluated. Long term strategic planning is critical to plan beyond initial compliance with the Agreement and should be codified and negotiated through the IT Executive Committee.

Best practice core management artifacts such as a Master Integration Plan and System Roadmap need to be formalized and put under configuration management. Doing so will aid in removing integration and planning ambiguity, which are essential to successful implementation. Ultimately documentation serves as the path to compliance as agreed to by principal stakeholders performing tasks or providing resources. Oversight from the IT Executive Committee is being reconstituted and must be more formally

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institutionalized between the DSP, PRITS, and PRPB. With or without involvement from DSP or PRITS, PRPB must be committed to advocating for itself as a stakeholder to achieve technological success. PRPB's IT management must continue to become more acute over time as discipline, rigor, attention to detail, and cadence will need to be effective and transferable to ensure long-term sustainability. Ultimately as PRPB continues to mature and advance its technological abilities, it must also advance and embrace its role as overseer and honest broker by incorporating outcome-based metrics beyond the technology. This includes Service Level Agreements, strategic contracting for skills and support, oversight practices like ReformStat, and metrics, etc.

Continuously minimizing risks will require actively eliminating distractions and low return on investment (ROI) activities. The initial implementation of Axon's RMS has been pushed to July 2026 with required solutioning and improvement of the RMS continuing beyond its launch. It is the Monitor's Office's opinion that risk to successful implementation remains high and should be managed as such.

Data validation and purification remains ambiguous. As stated in the prior CMR:

"On at least two levels, the veracity of data matters. The first being that without validation, the investments in technology and procedure cannot be factually reconciled...Second, without validation...of the working data, sorts and queries of data may not genuinely represent the status of police operations...A plan for data validation, verification, and reconciliation is needed...trend data is critical to transformation, cultural, and behavioral change."

The IT CAP continues to be a focal point for priorities and activity. The Commonwealth is strongly urged to continue to evolve the IT CAP into a "living Plan of Action" for both tactical and strategical implementation without an end date. Regular revision and streamlining is recommended to improve focus and priorities given the progress thus far.

As stated in the prior CMR, the Monitor's Office urges the Commonwealth to 1) continue to use the advisory services made available to the fullest extent possible, 2) embrace third party validation and verification in technology and process development and delivery, 3) prepare for long term sustainability and rely on succession planning and knowledge transfer strategies, 4) employ aggressive and rigorous management and planning practices that will ensure optimal and predictable outcomes for the Commonwealth, and 5) dedicate itself to rigorous cyber planning and hardening as well as continuing infrastructure assessments.

In summary, the Commonwealth's focus on technical capacity is essential as is the fidelity of its management behavior. If not focused and maintained, the Commonwealth risks a stall in progress. In light of this scenario, PRPB should identify, optimize, and designate its essential and critical portfolio of IT functionality and shed itself of unnecessary and low ROI tools thereby simplifying its portfolio of IT assets. The Commonwealth needs to focus on hygiene, access control, cyber, and management rigor. A plan for data reconciliation is still unavailable and remains an essential component of the eventual validation method for evaluation of full compliance.

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Overall, the Commonwealth's compliance with the six Information Systems and Technology paragraphs has been revised to deferred to accommodate the substantial changes expected from the implementation of Axon and Benchmark Analytics systems. See figure 10.

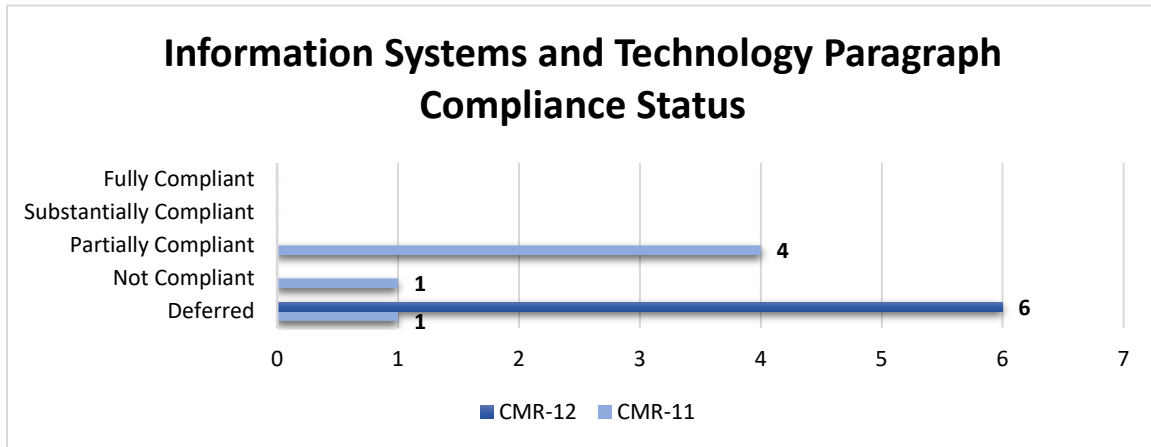


Figure 10. Information Systems and Technology: Paragraph Compliance Status