"Report Card" Summarizing the Monitor's Evaluation of Compliance with the Consent Judgments as of the Quarter Ending November 30, 2004

er				COMPLIA Quarters)			EVALUAT	ION TIMING	
	Sep '04- Nov '04	Jun '04- Aug '04	Mar '04- May '04	Dec ,03- Feb '04	Sep '03- Nov '03	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation

USE OF FORCE AND ARREST AND WITNESS DETENTION CONSENT JUDGMENT

UPINITIONS No task U2-13 U2-13 IL GENERAL PROVISIONS U2-13 No task IL U2-13 IL U2-13 IL U2-13 IL SEG OF PROCE POLICY A. General Use of Force Ordinico of UOF) X X May-04 U14 Revision of Policy (Envision of UOF) X X May-04 May-05 U16 Opportunity to Submit X X May-04 May-05 U17 Prohibition on Choke Holds X X May-04 May-05 U18 Revision of Policy within 3 Months X X May-04 May-05 U19 Strike to Head Equats Deady Force X X May-04 May-05 U20 Finarms Policy X X Aug-04 Aug-05 U21 Faiture to Re-Quality X X Aug-04 Aug-05 U21 Revision of Policy X X Aug-04 Aug-05		DEFINITIONS							
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U30 Prohibited Methods X X Aug-04 Feb-05		U28 Who May Conduct Investigations	X	X		X	Aug-04	Feb-05	
		U29 Requirements of Policy	X	X		X	Aug-04	Feb-05	
U31 Compelling of Statements 🗶 🗶 Aug-04 Feb-05		U30 Prohibited Methods	X	X		X	Aug-04	Feb-05	
		U31 Compelling of Statements	X	X		X	Aug-04	Feb-05	

 \checkmark = Compliant; x = Non-Compliant;

NYE = Not Yet Evaluated; DW = Determination Withheld

Cor	nplia		nmarizing the Monitor's Evaluation of he Consent Judgments as of the Quarter 30, 2004				COMPLIA Quarters)					
	-			Sep '04- Nov '04			Dec ,03- Feb '04	•	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
		U32	Report Requirements		X		X		X	Aug-04	Feb-05	
		U33	Review Requirements		X		X		X	Aug-04	Feb-05	
	В.	Use of Fo	rce and Prisoner Injury Investigations									
		U34	Documentation of UOF and Prisoner Injury	X		X		X	X	Nov-04	May-05	
		U35	Notification Requirements	X		X		X	X	Nov-04	May-05	
		U36	Command Investigation Timelimits	X		X		X	X	Nov-04	May-05	
	C.	Review of	Critical Firearm Discharges and In-Custody Deaths									
		U37	Creation of Shooting Team	X		X		X	X	Nov-04	May-05	
		U38	Protocol for Investigations of Critical Firearms Discharges	X		X		X	X	Nov-04	May-05	
		U39	Command Level Force Review Team	X		X		X	X	Nov-04	May-05	
		U40	Time Limits for Command Level Force Review Team	X		x		x	x	Nov-04	May-05	
		U41	Aggregate Review	X		X		X	X	Nov-04	May-05	
٧.	AR		DETENTION POLICIES AND PRACTICES									
	Α.	Arrest Pol	icies									
		U42	Revision of Arrest Policies	DW		X		X	DW	Nov-04	May-05	
		U43	Review of All Arrests	DW		X		X	DW	Nov-04	May-05	
	В.	Investigate	ory Stop Policies									
		U44	Revision of Policies	X		X		X	X	Nov-04	May-05	
		U45	Documentation Requirement	X		X		X	X	Nov-04	May-05	
	C.	Witness Io	lentification and Questioning Policies									
		U46	Revision of Policies	X		X		X	X	Nov-04	May-05	
		U47	Submission to DOJ within 3 months	X		X		X	X	Nov-04	May-05	
		U48	Documentation of Interviews and Interrogations	X		X		X	X	Nov-04	May-05	
	D.	Prompt Ju	dicial Review Policies									
		U49	Revision of Policies and Requirement of Arraignment within 48 Hours		X			X	X	Aug-04	Feb-05	

Co	mplia		nmarizing the Monitor's Evaluation of he Consent Judgments as of the Quarter 30, 2004				COMPLIA Quarters)					
	-			Sep '04- Nov '04		Mar '04- May '04	Dec ,03- Feb '04	Sep '03- Nov '03	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
		U50	Requirement of Warrant Request	X	DW			X	X	Nov-04	Feb-05	
		U51	Documentation of Late Request for Arraignment Warrants		X			X	X	Aug-04	Feb-05	
	Ε.	Hold Polic	ies									
		U52	Revision of Policies		X			X	X	Aug-04	Feb-05	
		U53	Documentation of all Holds		X			X	X	Aug-04	Feb-05	
	F.	Restriction										
_		U54	Development of Restriction Policies		X		X		X	Aug-04	Feb-05	
		U55	Documentation of Restrictions		X		X		X	Aug-04	Feb-05	
_	G.	Material V	vitness Policies									
			Revision of Material Witness Policies	X	DW		X		X	Nov-04	Feb-05	
_			Requirement of Court Order		X		X		X	Aug-04	Feb-05	
	Н.		ation of Custodial Detention									
_			Revision of Policy	X		X		X	X	Nov-04	May-05	
	I.		Notification									
-			Time Limits for Written Reporting of Violations	X		X	X		X	Nov-04	May-05	
			Daily Reporting Requirement		X		X		X	Aug-04	Feb-05	
VI.	EX		OMPLAINTS									
			Revision of External Complaints Policies	X		X		X	X	Nov-04	May-05	
_		U62	Informational Campaign									
			a. Informing persons about filing complaints						• •			Subparagraph not separately assessed
_			b. Distribution of material	X		X	X	X	X	Nov-04	May-05	
			c. Complaint Process Broadcasts	-		X	X	X		Nov-04	May-05	
			d. Informational Campaign Placards			X	X	X		Nov-04	May-05	
			Informational Brochures and Contact Forms	DW		X		X	DW	Nov-04	May-05	
	Α.	Intake and	•			•						
			Policies Regarding Intake and Tracking	<u>X</u>		X		<u>X</u>	<u> </u>	Nov-04	May-05	
	_		Factual Account by Intake Officer	X	_	X	_	X	X	Nov-04	May-05	
		U66	Unique Identifier					X	1	Nov-04	May-05	

Con		nmarizing the Monitor's Evaluation of he Consent Judgments as of the Quarter 30, 2004			SMENT OF (for last 5				EVALUATION TIMING		
	-		Sep '04- Nov '04	Jun '04- Aug '04	Mar '04- May '04	Dec ,03- Feb '04	Sep '03- Nov '03	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
	B. External C	Complaint Investigation									
	U67	Revision of External Complaint Investigations Policy	× ×		X		X	X	Nov-04	May-05	
	U68	External Complaint Review Process Time Limits	X		X		X	X	Nov-04	May-05	
	U69	External Complaint Dispositions	X					X	Nov-04	May-05	
VII.	GENERAL PO	LICIES									
	U70	Clear Definitions of Terms	X		X		X	X	Nov-04	May-05	
	U71	Community Comment on Proposed Policy Revisions	X		×		×	×	Nov-04	May-05	
	U72	Police Action in Violation of DPD Policy		X	X	DW		X	Aug-04	Feb-05	
	U73	Deployment Plan for Supervisors	DW		X	DW		DW	Nov-04	Feb-05	
	U74	Enforcement of Policy on Reporting Misconduct		X		X		X	Aug-04	Feb-05	
	U75	Revision of Off-Duty Action Policies		DW		X		DW	Aug-04	Feb-05	
	U76	Revision of Prisoner Policies		X		X		X	Aug-04	Feb-05	
	U77	Foot Pursuit Policy Development		X		X		X	Aug-04	Feb-05	
VIII.	MANAGEMEN	T AND SUPERVISION									
	U78	Development of Risk Management Plan	X	X	X	X		X	Nov-04	May-05	
	A. Risk Mana	agement Database									
	U79	Expansion of Risk Management System	X	X	X	X		X	Nov-04	May-05	
	U80	Requirements for New Risk Management Database	×		X		×	X	Nov-04	May-05	
	U81	Requirement of Identifiers	X		X		X	X	Nov-04	May-05	
	U82	Data Input Plan	X		X		X	X	Nov-04	May-05	
	U83	Report Protocol	X		X		X	X	Nov-04	May-05	
	U84	Review Protocol		X				X	Aug-04	Feb-05	
	U85	Modular Development of Database		X		X		X	Aug-04	Feb-05	
	U86	Common Control Numbers	X		X		X	X	Nov-04	May-05	
	U87	Information Retention	X		X		X	X	Nov-04	May-05	

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Ū		Sep '04- Nov '04		Mar '04- May '04		Sep '03- Nov '03	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
U88	Schedule for Development									
	a. Submit Data Input Plan to DOJ	X		X		X	X	Nov-04	May-05	
	b. Submit Report Protocol and RFP to DOJ	X		X		X	X	Nov-04	May-05	
	c. Issue RFP	X		X		X	X	Nov-04	May-05	
	d. Submit Review Protocol to DOJ		X				X	Aug-04	Feb-05	
	e. Select Contractor for Risk Management Databas	se	X				X	Aug-04	Feb-05	
	f. Beta Version of Risk Management Database						NYE		Aug-05	Deadline for beta version is June 30, 2005
	g. Risk Management Database Operational						NYE		Feb-06	Deadline for operation and implementation is December 31, 2005
U89	Interim System to Detect Patterns of Behavior		X		X		X	Aug-04	Feb-05	
U90	Modification Protocol						NYE			Compliance will be assessed as needed
B. Performan	nce Evaluation System									
U91	Performance Evaluations		X		X		X	Aug-04	Aug-05	
C. Oversight										
U92	Audit Protocol	X	X	DW	DW	X	X	Nov-04	Feb-05	2004-05 audit protocol not completed
U93	Audit Reporting Requirements	X	X		X	X	X	Nov-04	Feb-05	Consistency not reported upon; actions unknown
U94	a. Audits of UOF and Prisoner Injuries	X	X		X	X	X	Nov-04	Feb-05	Audit not completed
	b. Audits of Misconduct Investigations	X	X		X	X	X	Nov-04	Feb-05	Audit not completed
U95	a. Audits of Probable Cause	X	X		X	X	X	Nov-04	Feb-05	Audit not completed
	b. Audits of Stop and Frisk	X	X		X	X	X	Nov-04	Feb-05	Audit not completed
	c. Audits of Witness Identification and Questioning Documentation	X	X		X	X	X	Nov-04	Feb-05	Audit not completed
U96	Audits of Custodial Detention Practices	X	X		X	X	X	Nov-04	Nov-05	Timeliness and quality concerns
U97	OCI Audits of External Complaints and Investigations	X	X		X	×	×	Nov-04	Feb-05	Audit not completed
U98	Videotape Reviews		X		X	X	X	Aug-04	Feb-05	
U99	Regular Meetings with Prosecutors	1		1	DW		1	Nov-04	May-05	

Cor	nplia	Card" Summarizing the Monitor's Evaluation of nce with the Consent Judgments as of the Quarter November 30, 2004		ASSES		F COMPLIA					
			Sep '04- Nov '04			Dec ,03- Feb '04	•	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
	D.	Use of Video Cameras									
		U100 Repair or Replacement of Video Cameras		X		X		X	Aug-04	Feb-05	
		U101 Revision of Video Camera Policy		X		X		X	Aug-04	Feb-05	
		U102 Video Camera Recording Requirements		X		X		X	Aug-04	Feb-05	
	F.	Discipline									
		U103 Elimination of Backlogs		X		X		X	Aug-04	Feb-05	
		U104 Steps to Prevent Backlog		X		X		X	Aug-04	Feb-05	
		U105 Creation of Disciplinary Matrix		X		X		X	Aug-04	Feb-05	
IX.	TR	AINING									
_	Α.	Oversight and Development									
		U106 Review of all UOF and Arrest and Detention Training	X		×		X	×	Nov-04	May-05	
		Michigan Law Enforcement Officers Training Council Standards	×		X		X	×	Nov-04	May-05	
		U108 Individual Training Records	X		X		X	X	Nov-04	May-05	
		Approved Lesson Plans / Scenario-Based Training	X		x		X	X	Nov-04	May-05	
		U110 Civil Lawsuits	X		X			X	Nov-04	May-05	
		U111 Distribution and Explanation of the UOF CJ	X		X			X	Nov-04	May-05	
	В.	Use of Force Training									
		U112 Annual UOF Training	X		X		X	X	Nov-04	May-05	
	C.	Firearms Training									
		U113 Firearms Training Protocol	X		X		X	X	Nov-04	May-05	
	D.	Arrest and Police-Citizen Interaction Training									
		Annual Arrest and Police-Citizen Interaction Training	×		×		X	X	Nov-04	May-05	

Con	plia	Card" Summarizing the Monitor's Evaluation of nce with the Consent Judgments as of the Quarter lovember 30, 2004		ASSES	SMENT OF (for last 5	COMPLIA Quarters)			EVALUATION TIMING		
	U		Sep '04- Nov '04		Mar '04- May '04	,	Sep '03- Nov '03	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
	E.	Custodial Detention Training									
		U115 Annual Custodial Detention Training		X		X	X	X	Aug-04	Feb-05	
		U116 Advise Officers not to Delay Arraignment		X		X	X	X	Aug-04	Feb-05	
		U117 Advise that Materiality of Witness is Judicial Detern	nination	X		X	X	X	Aug-04	Feb-05	
	F.	Supervisory Training									
		U118 Training on the Evaluation of Written Reports		X		X	X	X	Aug-04	Feb-05	
		U119 Leadership and Command Accountability Training		X			X	X	Aug-04	Feb-05	
		U120 Risk Assessment Training Requirement		X		X	X	X	Aug-04	Feb-05	
	G.	Investigator Training									
		U121 Training for Evaluating Credibility		X		X	X	X	Aug-04	Feb-05	
		U122 Handling External Complaints		X		X	X	X	Aug-04	Feb-05	
	Н.	Field Training									
		U123 Enhancement of FTO Program		X		DW	X	DW	Aug-04	Feb-05	
Х.	MO	NITORING, REPORTING, AND IMPLEMENTATION									
		U124 - 138									No task
		U139 Reopening of Investigations Deemed Incomplete						NYE	Nov-04	Feb-05	Reviewed but compliance assessment was not required
		U140 - 154									No task

"Report Card" Summarizing the Monitor's Evaluation of Compliance with the Consent Judgments as of the Quarter Ending November 30, 2004

ter				COMPLIA Quarters)			EVALUAT	ION TIMING	
						Status as of	Last Eval'n	Next Expected	
	Sep '04-	Jun '04-	Mar '04-	-03, Dec	Sep '03-	Last	Quarter	Eval'n	
	Nov '04	Aug '04	May '04	Feb '04	Nov '03	Eval'n	Ending	Q/E	Comments re: Last Evaluation

CONDITIONS OF CONFINEMENT CONSENT JUDGMENT

I.	DEFINITIONS								
	C1								No task
П.	GENERAL PROVISIONS								
	C2 - 13								No task
III.	FIRE SAFETY POLICIES								
	C14 Life Safety Code Compliance	X				X	Nov-04	Aug-05	
	C15 Detection, Suppression and Evacuation Programs	X		X		X	Nov-04	Aug-05	
	C16 Fire Safety Program Development	X		X	X	X	Nov-04	Aug-05	
	C17 Fire Safety Program Implementation	X				X	Nov-04	Aug-05	
	C18 Fire Safety Interim Measures	X		X	X	X	Nov-04	Aug-05	
	C19 Safety Equipment Testing	X		X		X	Nov-04	Aug-05	
	C20 Smoking Policy			1	√	1	Feb-04	Aug-05	
	C21 Storage of Flammable Liquids			X	X	×	Feb-04	Aug-05	Non-compliance with training requirements
	C22 Removal of Cane Ceiling Tiles		-	X	X	X	Feb-04	Aug-05	
IV.	EMERGENCY PREPAREDNESS POLICIES								
	C23 Ensure Safety Level	X		X		X	Nov-04	Aug-05	
	C24 Emergency Preparedness Program Development	X	X		X	X	Nov-04	May-05	
	C25 Key Control Policies	X		X		X	Nov-04	Aug-05	
۷.	MEDICAL AND MENTAL HEATH CARE POLICIES								
	C26 Identification and Response for Special Needs	X	X			X	Nov-04	May-05	
	C27 Screening Program Development	X	×		X	X	Nov-04	May-05	
	C28 Minimum Standards for Screening Program	X	×		X	X	Nov-04	May-05	
	C29 Minimum Standards for Medical Protocols	X	×		X	X	Nov-04	May-05	
	C30 Infectious Disease Policy	NYE	×		X	NYE	Nov-04	Feb-05	
	C31 Prisoner Health Information Protocol	X	X		X	X	Nov-04	May-05	
	C32 Prescription Medication Policy	X	X		X	X	Nov-04	May-05	
	C33 Suicide Watch Garb	X	X		X	X	Nov-04	May-05	
	C34 Suicide Hazard Removal	X	×		X	X	Nov-04	May-05	

Con	port Card" Summarizing the Monitor's Evaluation of pliance with the Consent Judgments as of the Quarter ing November 30, 2004		ASSES	SMENT OF (for last 5	COMPLIA Quarters)			EVALUAT	ION TIMING	
				Mar '04- May '04			Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
VI.	PRISONER SAFETY POLICIES									
	C35 Ensure Safety Level		X		X		X	Aug-04	Feb-05	
	C36 Security Screening of Prisoners		X		X		X	Aug-04	Feb-05	
	C37 Cell Check Policies		X		X		X	Aug-04	Feb-05	
	C38 Observation Cell Policy		X		X		X	Aug-04	Feb-05	
VII.	ENVIRONMENTAL HEALTH AND SAFETY POLICIES									
	C39 Cleanliness of Cells		DW		 Image: A second s		DW	Aug-04	Feb-05	
	C40 Cleaning Policy		X		X		X	Aug-04	Feb-05	
	C41 Maintenance Policy		X		X		X	Aug-04	Feb-05	
	C42 Heating and Ventilation		X	DW	DW		X	Aug-04	Feb-05	
	C43 Repairs to be Made		- - -		- -		- -	Aug-04	Feb-05	
	C44 Lighting Requirements		X		X		X	Aug-04	Feb-05	
	C45 Toilet Access		X		X		X	Aug-04	Feb-05	
	C46 Air Purification		-		-		-	Aug-04	Feb-05	
VIII.	POLICIES CONCERNING PERSONS WITH DISABILITIES									
	C47 Accommodations for Persons with Disabilities		DW				DW	Aug-04	Feb-05	
	C48 Detention of Individuals with Disabilities		X		X		X	Aug-04	Feb-05	
IX.	FOOD SERVICE POLICIES									
	C49 Food Storage and Service	X		X		X	X	Nov-04	May-05	
	C50 Development of Food Service Policies	X		X		X	X	Nov-04	May-05	
Х.	PERSONAL HYGIENE POLICIES									
	C51 Availability of Personal Hygiene Items	X				X	X	Nov-04	May-05	
XI.	USE OF FORCE AND RESTRAINTS POLICIES									
	C52 Compliance with DPD's UOF Policy		X		X		X	Aug-04	Feb-05	
	C53 UOF Protocols for Prisoners		X		X		X	Aug-04	Feb-05	
	C54 Handcuffing to Benches		X		X		X	Aug-04	Feb-05	

Com		nmarizing the Monitor's Evaluation of he Consent Judgments as of the Quarter 30, 2004		ASSES	SMENT OF (for last 5	COMPLI			EVALUAT	ION TIMING	
			Sep '04- Nov '04	Jun '04- Aug '04	Mar '04- May '04		Sep '03- Nov '03	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
XII.	INCIDENT DO	CUMENTATION, INVESTIGATION AND REVIEW									
	C55	Investigations of In-Custody Deaths		X		X		X	Aug-04	Feb-05	
	C56	UOF Reporting		X		X		X	Aug-04	Feb-05	
	C57	Injury Reporting		X		X		X	Aug-04	Feb-05	
XIII.	EXTERNAL C	OMPLAINTS									
		Processing of External Complaints		X		X		X	Aug-04	Feb-05	
		Complaint Investigation		X		X		X	Aug-04	Feb-05	
XIV.	GENERAL PO		••		••			••			
	C60	Clear Definition of Terms	X		X		X	X	Nov-04	May-05	
	C61	Community Comment on Proposed Policy Revisions	X		X		×	X	Nov-04	May-05	
XV.	MANAGEMEN	IT AND SUPERVISION									
	C62	Regular Operation Evaluation		X				X	Aug-04	Feb-05	
	C63	Operation in Compliance with Risk Management Pla	an	X		X		X	Aug-04	Feb-05	
	C64	Video Camera Policy		X				X	Aug-04	Feb-05	
	C65	a. Audits of Holding Cell UOF and Prisoner Injuries	X	X		X	X	X	Nov-04	Feb-05	Audit not completed
		b. Audits of Misconduct Investigations	X	X		X	X	X	Nov-04	Feb-05	Audit not completed
	C66	a. HCCC to Assure Compliance with COC-CJ	X	×	X	×	×	X	Nov-04	Feb-05	All holding cell policies not implemented
		 b. HCCC Fire Detection, Suppression & Evacuation Audits 	×	X	X	X	X	X	Nov-04	Feb-05	Audit not completed
	C67	HCCC Emergency Preparedness Audits	X	X	X	X	X	X	Nov-04	Feb-05	Timeliness and quality concerns
	C68	HCCC Medical/Mental Health Audits	X	X	X	X	X	X	Nov-04	Feb-05	Audit not completed
	C69	HCCC Detainee Safety Programs and Policies Audits	X	X	X	X	X	X	Nov-04	Feb-05	Audit not completed
	C70	HCCC Environmental Health and Safety Programs Audits	×	X	X	X	×	X	Nov-04	Feb-05	Audit not completed
	C71	HCCC Food Service Program Audits	X	X	X	X	X	X	Nov-04	Feb-05	Timeliness and quality concerns
	C72	Audit Reporting Requirements	X	X	X	X	X	X	Nov-04	Feb-05	Consistency not reported upon; actions unknown

"Report Card" Summarizing the Monitor's Evaluation of Compliance with the Consent Judgments as of the Quarter Ending November 30, 2004	ASSESSMENT OF COMPLIANCE [1] (for last 5 Quarters)						EVALUATION TIMING		
	Sep '04- Nov '04		Mar '04- May '04		•	Status as of Last Eval'n	Last Eval'n Quarter Ending	Next Expected Eval'n Q/E	Comments re: Last Evaluation
XVI. TRAINING									
C73 Training of Detention Officers		X			X	X	Aug-04	Aug-05	
C74 Training Records		X			X	X	Aug-04	Aug-05	
C75 Emergency Preparedness Training		X			X	X	Aug-04	Aug-05	
C76 Medical/Mental Health Screening Program Traini	ng	X			X	X	Aug-04	Aug-05	
C77 Detainee Safety Training		X			X	X	Aug-04	Aug-05	
C78 Environmental Health and Hygiene Training		X			X	X	Aug-04	Aug-05	
XVII. MONITORING AND REPORTING									
C79 - 93									No task
C94 Reopening of Investigations Deemed Incomplete						NYE	Nov-04	May-05	Reviewed but compliance assessment was not required
C95 - 99									No task
STIPULATION PURSUANT TO THE PRISON LITIGATION XVIII. REFORM ACT, 18 U.S.C. 3626									
C100 - 102									No task
XIX. IMPLEMENTATION AND ENFORCEMENT									
C103 - 110									No task
XX. MISCELLANEOUS									
C111 - 112									

NOTES: [1] The Monitor assesses each paragraph's various components of compliance (policy, training, implementation, audit) separately. However, if the Department is in non-compliance with any of these components for a given paragraph, then the Department is in overall non-compliance with that paragraph. This Report Card reflects only the overall compliance rating.