

REPORT OF THE INDEPENDENT MONITOR FOR THE DETROIT POLICE DEPARTMENT

"Report Card" Summarizing the Monitor's  
Evaluation of Compliance with the Consent Judgments  
as of the Quarter Ending May 31, 2008

	ASSESSMENT OF COMPLIANCE [1] (for last 5 Quarters)					EVALUATION TIMING		Comments re: Last Evaluation
	Feb '08 - May '08	Dec '07- Feb '08	Sep '07- Nov '07	Jun '07- Aug '07	Mar '07- May '07	Most Recent Eval'n	Last Eval'n Quarter Ending	
<b>I. DEFINITIONS</b>								
U1								No monitoring requirements
<b>II. GENERAL PROVISIONS</b>								
U2 - 13								No monitoring requirements
<b>III. USE OF FORCE POLICY</b>								
A. General Use of Force Policies								
U14					✓	May-06	-	In Compliance - "Policy-only" paragraph
U15					✓	May-06	-	In Compliance - "Policy-only" paragraph
U16					✓	May-06	-	In Compliance - "Policy-only" paragraph
U17					✓	May-06	-	In Compliance - "Policy-only" paragraph
U18	DW			X	DW	May-08	Aug-08	
U19					✓	May-06		In Compliance - "Policy-only" paragraph
B. Use of Firearms Policy								
U20					✓	Aug-06	-	In Compliance - "Policy-only" paragraph
U21		NYE		X	NYE	Feb-08	Aug-08	In compliance with policy requirements
U22		✓		✓	✓	Feb-08	Aug-08	In compliance with policy requirements
U23	X	NYE		NYE	X	May-08	Aug-08	In compliance with policy requirements
C. Intermediate Force Device Policy								
U24		X		X	X	Feb-08	Aug-08	In compliance with policy requirements
D. Chemical Spray Policy								
U25		✓		DW	✓	Feb-08	Aug-08	In compliance with policy requirements
U26		✓		DW	✓	Feb-08	Aug-08	In compliance with policy requirements
<b>IV. INCIDENT DOCUMENTATION, INVESTIGATION, AND REVIEW</b>								
A. General Investigations of Police Action								
U27	X		X		X	May-08	Nov-08	In compliance with policy requirements
U28	X		X		X	May-08	Nov-08	In compliance with policy requirements
U29	X		X		X	May-08	Nov-08	In compliance with policy requirements
U30	✓		X		✓	May-08	Nov-08	In compliance with policy requirements
U31	✓		✓		✓	May-08	Nov-08	In compliance with policy requirements
U32	X		X		X	May-08	Nov-08	In compliance with policy requirements
U33	X		X		X	May-08	Nov-08	In compliance with policy requirements

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<b>B. Use of Force and Prisoner Injury Investigations</b>									
U34	Documentation of UOF and Prisoner Injury	X		X		X	May-08	Nov-08	In compliance with policy requirements
U35	Notification Requirements	X		X		X	May-08	Nov-08	In compliance with policy requirements
U36	Command Investigation Timelimits	X		X		X	May-08	Nov-08	In compliance with policy requirements
<b>C. Review of Critical Firearm Discharges and In-Custody Deaths</b>									
U37	Creation of Shooting Team	DW		✓		DW	May-08	Nov-08	
U38	Protocol for Investigations of Critical Firearms Discharges	X		X		X	May-08	Nov-08	In compliance with policy requirements
U39	Command Level Force Review Team	X		X		X	May-08	Nov-08	In compliance with policy requirements
U40	Time Limits for Command Level Force Review Team	X		X		X	May-08	Nov-08	In compliance with policy requirements
U41	Aggregate Review	X		X		X	May-08	Nov-08	In compliance with policy requirements
<b>V. ARREST AND DETENTION POLICIES AND PRACTICES</b>									
<b>A. Arrest Policies</b>									
U42	Revision of Arrest Policies					✓	May-06	-	In Compliance - "Policy-only" paragraph
U43	Review of All Arrests	✓		X		✓	May-08	Nov-08	
<b>B. Investigatory Stop Policies</b>									
U44	Revision of Policies					✓	May-05	-	In Compliance - "Policy-only" paragraph
U45	Documentation Requirement	X		X		X	May-08	Nov-08	
<b>C. Witness Identification and Questioning Policies</b>									
U46	Revision of Policies					✓	May-05	-	In Compliance - "Policy-only" paragraph
U47	Submission to DOJ within 3 months					✓	May-05	-	In Compliance - "Policy-only" paragraph
U48	Documentation of Interviews and Interrogations	X		X		X	May-08	Nov-08	
<b>D. Prompt Judicial Review Policies</b>									
U49	Revision of Policies and Requirement of Arraignment within 48 Hours	X	DW		P✓	X	May-08	Aug-08	In compliance with policy requirements
U50	Requirement of Warrant Request	X	DW		X	X	May-08	Aug-08	
U51	Documentation of Late Request for Arraignment Warrants	P✓	DW		X	P✓	May-08	Aug-08	
<b>E. Hold Policies</b>									
U52	Revision of Policies					✓	Feb-06	-	In Compliance - "Policy-only" paragraph
U53	Documentation of all Holds		X		X	X	Feb-08	Aug-08	
<b>F. Restriction Policies</b>									
U54	Development of Restriction Policies					✓	Feb-06	-	In Compliance - "Policy-only" paragraph
U55	Documentation of Restrictions		X		X	X	Feb-08	Aug-08	

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G. Material Witness Policies									
U56	Revision of Material Witness Policies					✓	Feb-06	-	In Compliance - "Policy-only" paragraph
U57	Requirement of Court Order	✓		✓		✓	Feb-08	Aug-08	
H. Documentation of Custodial Detention									
U58	Arrest and Detention Documentation	X	X		X	X	May-08	Aug-08	
I. Command Notification									
U59	Time Limits for Written Reporting of Violations	X	X		X	X	May-08	Aug-08	
U60	Daily Reporting Requirement		X	X		X	Feb-08	Aug-08	In compliance with policy requirements
<b>VI. EXTERNAL COMPLAINTS</b>									
U61	Revision of External Complaints Policies	✓	✓		NYE	✓	May-08	Nov-08	In compliance with policy requirements
U62	Informational Campaign								
	a. Informing persons about filing complaints								Subparagraph not separately assessed
	b. Distribution of material	✓	✓		✓	✓	May-08	Nov-08	
	c. Complaint Process Broadcasts	✓	✓		✓	✓	May-08	Nov-08	
	d. Informational Campaign Placards	P✓	✓		✓	P✓	May-08	Nov-08	
U63	Informational Brochures and Contact Forms	✓	✓		✓	✓	May-08	Nov-08	
A. Intake and Tracking									
U64	Policies Regarding Intake and Tracking	NYE	✓		NYE	NYE	May-08	Nov-08	In compliance with policy requirements
U65	Factual Account by Intake Officer	✓	✓		NYE	✓	May-08	Nov-08	In compliance with policy requirements
U66	Unique Identifier	X	✓		NYE	X	May-08	Nov-08	In compliance with policy requirements
B. External Complaint Investigation									
U67	a. Complaints referred for investigation	NYE	DW		NYE	NYE	May-08	Nov-08	In compliance with policy requirements
	b. Informal resolution of certain complaints	✓	✓		NYE	✓	May-08	Nov-08	In compliance with policy requirements
	c. Refer within five business days	X	X		NYE	X	May-08	Nov-08	In compliance with policy requirements
	d. Complainant informed of complaint status	X	X		NYE	X	May-08	Nov-08	In compliance with policy requirements
	e. Written criteria for investigator applicants	NYE	NYE		NYE	NYE	May-08	Nov-08	In compliance with policy requirements
	f. Pre-service and in-service training	NYE	X		NYE	NYE	May-08	Nov-08	In compliance with policy requirements
	g. Complete investigations within 60 days	X	X		NYE	X	May-08	Nov-08	In compliance with policy requirements
	h. Complainant notified of outcome.	DW	X		NYE	DW	May-08	Nov-08	In compliance with policy requirements
U68	External Complaint Review Process Time Limits	X	X		NYE	X	May-08	Nov-08	In compliance with policy requirements
U69	External Complaint Dispositions	✓	NYE		NYE	✓	May-08	Nov-08	In compliance with policy requirements

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<b>VII. GENERAL POLICIES</b>										
U70	Clear Definitions of Terms	✓		✓		✗	✓	May-08	Nov-08	In compliance with policy requirements
U71	Community Comment on Proposed Policy Revisions	✓		✓		✓	✓	May-08	Nov-08	In compliance with policy requirements
U72	Police Action in Violation of DPD Policy		✗		✗		✗	Feb-08	Aug-08	In compliance with policy requirements
U73	Deployment Plan for Supervisors		✗		✗		✗	Feb-08	Aug-08	In compliance with policy and in partial compliance with implementation rqmts; non-compliance with training rqmts
U74	Enforcement of Policy on Reporting Misconduct		✗		✗		✗	Feb-08	Aug-08	In compliance with policy requirements
U75	Revision of Off-Duty Action Policies	✗	DW		✗		✗	May-08	Aug-08	In compliance with policy requirements
U76	Revision of Prisoner Policies		✗		✗		✗	Feb-08	Aug-08	In compliance with policy requirements
U77	Foot Pursuit Policy Development		✗		✗		✗	Feb-08	Aug-08	In compliance with policy requirements
<b>VIII. MANAGEMENT AND SUPERVISION</b>										
U78	Development of Risk Management Plan					✗		Aug-06	-	Subparagraphs separately assessed beg. Feb 2007
	a. Risk Management Database (paragraphs 79-90)		✗		✗		✗	Feb-08	Aug-08	
	b. Performance Evaluation System (paragraph 91)		NYE		DW		NYE	Feb-08	Aug-08	To be assessed in conjunction with U91
	c. Auditing Protocol (paragraphs 92-99)		✗		✗		✗	Feb-08	Aug-08	
	d. Regular and Periodic Review of All DPD Policies		✓		✓		✓	Feb-08	Aug-08	
	e. Regular meetings of DPD managementDPD		✓		✗		✓	Feb-08	Aug-08	
A. Risk Management Database										
U79	Expansion of Risk Management System	✗		✗		✗	✗	May-08	Nov-08	
U80	Requirements for New Risk Management Database	✗		✗		✗	✗	May-08	Nov-08	
U81	Requirement of Identifiers	✗		✗		✗	✗	May-08	Nov-08	
U82	Data Input Plan					✓	✓	May-07	-	
U83	Report Protocol						✓	Nov-05	-	
U84	Review Protocol						✓	Aug-05	-	
U85	Modular Development of Database		✓		✓		✓	Feb-08	-	
U86	Common Control Numbers	✗		✗		✗	✗	May-08	Nov-08	
U87	Information Retention	✗		✗		✗	✗	May-08	Nov-08	

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U88	Schedule for Development								
	a. Submit Data Input Plan to DOJ					✓	Nov-06	-	
	b. Submit Report Protocol and RFP to DOJ					✓	Nov-05	-	
	c. Issue RFP					-	May-07	-	Monitoring discontinued Q/E May 31, 2007
	d. Submit Review Protocol to DOJ					✓	Aug-05	-	
	e. Select Contractor for Risk Management Database					✓	Feb-07	-	
U88	f. Beta Version of Risk Management Database		DW		X	DW	Feb-08	Aug-08	
	g. Risk Management Database Operational		NYE		X	NYE	Feb-08	Aug-08	
U89	Interim System to Detect Patterns of Behavior		X		X	X	Feb-08	Aug-08	Significant Progress Towards Compliance
U90	Modification Protocol					NYE			Compliance will be assessed as needed
B. Performance Evaluation System									
U91	Performance Evaluations		NYE		NYE	NYE	Feb-08	Aug-08	In compliance with policy requirements
C. Oversight									
U92	Audit Protocol			✓	DW	✓	Nov-07	Aug-08	
U93	Audit Reporting Requirements			X		X	Nov-07	Feb-09	
U94	a. UOF Investigations Audit			X	NYE	X	Nov-07	Aug-08	
	b. Prisoner Injuries Investigations Audit	NYE	NYE			NYE	May-08	Aug-08	
	c. Misconduct Investigations Audit			✓	NYE	✓	Nov-07	Aug-08	
U95	a. Arrest Practices Audit	NYE			X	NYE	May-08	Aug-08	Audit submitted on last day of quarter
	b. Stop and Frisk Audit			X	NYE	X	Nov-07	Aug-08	
	c. Witness Identification and Questioning Audit		X	DW	NYE	X	Feb-08	Aug-08	
U96	Audit of Custodial Detention Practices	NYE			✓	NYE	May-08	Aug-08	Audit submitted on last day of quarter
U97	OCI External Complaints Investigations Audit			X	NYE	X	Nov-07	Aug-08	
U98	Videotape Reviews		DW		X	DW	Feb-08	Aug-08	In compliance with policy requirements
U99	Regular Meetings with Prosecutors	✓		✓		✓	May-08	Nov-08	
D. Use of Video Cameras									
U100	Repair or Replacement of Video Cameras		X		X	X	Feb-08	Aug-08	In compliance with policy requirements
U101	Revision of Video Camera Policy		X		X	X	Feb-08	Aug-08	In compliance with policy requirements
U102	Video Camera Recording Requirements		X		X	X	Feb-08	Aug-08	In compliance with policy requirements

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F. Discipline									
U103 Elimination of Backlogs		✓		✓		✓	Feb-08	Aug-08	
U104 Steps to Prevent Backlog		X		X		X	Feb-08	Aug-08	
U105 Creation of Disciplinary Matrix		X		✓		X	Feb-08	Aug-08	In compliance with policy and implementation rqmts; non-compliance with training rqmts
<b>IX. TRAINING</b>									
A. Oversight and Development									
U106 Review of all UOF and Arrest and Detention Training	X		X		X	X	May-08	Nov-08	
U107 Michigan Law Enforcement Officers Training Council Standards	X		X		X	X	May-08	Nov-08	
U108 Individual Training Records	X		X		X	X	May-08	Nov-08	
U109 Approved Lesson Plans / Scenario-Based Training	X		X		X	X	May-08	Nov-08	
U110 Civil Lawsuits	✓		✓		✓	✓	May-08	Nov-08	
U111 Distribution and Explanation of the UOF CJ	X		X		X	X	May-08	Nov-08	
B. Use of Force Training									
U112 Annual UOF Training	X		X		X	X	May-08	Nov-08	
C. Firearms Training									
U113 Firearms Training Protocol	NYE		X		X	NYE	May-08	Nov-08	
D. Arrest and Police-Citizen Interaction Training									
U114 Annual Arrest and Police-Citizen Interaction Training	X		X		X	X	May-08	Nov-08	
E. Custodial Detention Training									
U115 Annual Custodial Detention Training		NYE		X		NYE	Feb-08	Aug-08	Pending monitor's review of re-submitted LP
U116 Advise Officers not to Delay Arraignment		NYE		X		NYE	Feb-08	Aug-08	Pending monitor's review of re-submitted LP
U117 Advise that Materiality of Witness is Judicial Determination		NYE		X		NYE	Feb-08	Aug-08	Pending monitor's review of re-submitted LP
F. Supervisory Training									
U118 Training on the Evaluation of Written Reports		X		X		X	Feb-08	Aug-08	
U119 Leadership and Command Accountability Training		X		X		X	Feb-08	Aug-08	
U120 Risk Assessment Training Requirement		X		X		X	Feb-08	Aug-08	
G. Investigator Training									
U121 Training for Evaluating Credibility		X		X		X	Feb-08	Aug-08	
U122 Handling External Complaints		X		X		X	Feb-08	Aug-08	

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<b>H. Field Training</b>									
U123 Enhancement of FTO Program		X		DW		X	Feb-08	Aug-08	
<b>X. MONITORING, REPORTING, AND IMPLEMENTATION</b>									
U124 - 138									No monitoring requirements
U139 Reopening of Investigations Deemed Incomplete		-	-	-	-	-	May-07	-	Compliance will be assessed as needed
U140 - 154									No monitoring requirements

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<b>CONDITIONS OF CONFINEMENT CONSENT JUDGMENT</b>									
<b>I. DEFINITIONS</b>									
C1								No monitoring requirements	
<b>II. GENERAL PROVISIONS</b>									
C2 - 13								No monitoring requirements	
<b>III. FIRE SAFETY POLICIES</b>									
C14			X			X	Nov-07	Aug-08	
C15			X			X	Nov-07	Aug-08	
C16			X			X	Nov-07	Aug-08	
C17			X			X	Nov-07	Aug-08	
C18			X			X	Nov-07	Aug-08	
C19			X			X	Nov-07	Aug-08	
C20			✓			✓	Nov-07	Aug-08	
C21			✓			✓	Nov-07	Aug-08	
C22						✓	Aug-05	-	
<b>IV. EMERGENCY PREPAREDNESS POLICIES</b>									
C23						X	Nov-07	Aug-08	
C24						X	Nov-07	Aug-08	
C25						X	Nov-07	Aug-08	
<b>V. MEDICAL AND MENTAL HEALTH CARE POLICIES</b>									
C26		X			X	X	Feb-08	Nov-08	
C27		X			X	X	Feb-08	Nov-08	
C28		✓			X	✓	Feb-08	-	In Compliance - "Policy-only" paragraph
C29		✓			X	✓	Feb-08	-	In Compliance - "Policy-only" paragraph
C30		DW			X	DW	Feb-08	Nov-08	Limited population assessed
C31		X			X	X	Feb-08	Nov-08	
C32		X			X	X	Feb-08	Nov-08	
C33		✓			✓	✓	Feb-08	Nov-08	
C34		✓			✓	✓	Feb-08	Nov-08	

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<b>VI. PRISONER SAFETY POLICIES</b>									
C35	Ensure Safety Level	X		X		X	Feb-08	Nov-08	
C36	Security Screening of Prisoners					DW	Nov-06	-	Subparagraphs separately assessed beginning August 2007
	a. Protocols / Objective-based Behavior	X		DW		X	Feb-08	Nov-08	
	b. Documentation / Communication b/t Shifts	X		X		X	Feb-08	Nov-08	
C37	Cell Check Policies	X		X		X	Feb-08	Nov-08	
C38	Observation Cell Policy		✓		✓	✓	Feb-08	Nov-08	
<b>VII. ENVIRONMENTAL HEALTH AND SAFETY POLICIES</b>									
C39	Cleanliness of Cells	✓			✓	✓	May-08	Feb-09	
C40	Cleaning Policy	X			X	X	May-08	Feb-09	In compliance with policy requirements
C41	Maintenance Policy	X			X	X	May-08	Feb-09	In compliance with policy requirements
C42	a. Ventilation	✓			✓	✓	May-08	Feb-09	
	b. Heating	✓			✓	✓	May-08	Feb-09	
C43	Repairs to be Made	✓			✓	✓	May-08	Feb-09	
C44	Lighting Requirements					✓	Feb-07	-	
C45	Toilet Access	✓			✓	✓	May-08	Feb-09	
C46	Air Purification					✓	Aug-05	-	
<b>VIII. POLICIES CONCERNING PERSONS WITH DISABILITIES</b>									
C47	Accommodations for Persons with Disabilities		DW			X	DW	Feb-08	Nov-08
C48	Detention of Individuals with Disabilities		X			X	X	Feb-08	Nov-08
<b>IX. FOOD SERVICE POLICIES</b>									
C49	Food Storage and Service	X			X	X	May-08	Feb-09	In compliance with policy requirements
C50	Development of Food Service Policies	X			X	X	May-08	Feb-09	In compliance with policy requirements
<b>X. PERSONAL HYGIENE POLICIES</b>									
C51	Availability of Personal Hygiene Items	X			✓	X	May-08	Feb-09	In compliance with policy requirements
<b>XI. USE OF FORCE AND RESTRAINTS POLICIES</b>									
C52	Compliance with DPD's UOF Policy		NYE		X	NYE	Feb-08	Aug-08	In compliance with policy requirements
C53	UOF Protocols for Prisoners		NYE		X	NYE	Feb-08	Aug-08	In compliance with policy requirements
C54	Handcuffing to Benches		✓		X	✓	Feb-08	Aug-08	

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REPORT OF THE INDEPENDENT MONITOR FOR THE DETROIT POLICE DEPARTMENT

"Report Card" Summarizing the Monitor's  
Evaluation of Compliance with the Consent Judgments  
as of the Quarter Ending May 31, 2008

		ASSESSMENT OF COMPLIANCE [1] (for last 5 Quarters)					EVALUATION TIMING		Comments re: Last Evaluation	
		Feb '08 - May '08	Dec '07- Feb '08	Sep '07- Nov '07	Jun '07- Aug '07	Mar '07- May '07	Most Recent Eval'n	Last Eval'n Quarter Ending		Next Expected Eval'n Q/E
<b>XII. INCIDENT DOCUMENTATION, INVESTIGATION AND REVIEW</b>										
C55	Investigations of UOF, Injuries and In-Custody Deaths	X	NYE		X		NYE	May-08	Aug-08	In compliance with policy requirements
C56	UOF Reporting	X	NYE		X		NYE	May-08	Aug-08	In compliance with policy requirements
C57	Injury Reporting	X	NYE		X		NYE	May-08	Aug-08	In compliance with policy requirements
<b>XIII. EXTERNAL COMPLAINTS</b>										
C58	Processing of External Complaints	✓		X		NYE	✓	May-08	Nov-08	In compliance with policy requirements
C59	Complaint Investigation	X		X		NYE	X	May-08	Nov-08	In compliance with policy requirements
<b>XIV. GENERAL POLICIES</b>										
C60	Clear Definition of Terms	✓		✓		X	✓	May-08	Nov-08	In compliance with policy requirements
C61	Community Comment on Proposed Policy Revisions	✓		✓		✓	✓	May-08	Nov-08	In compliance with policy requirements
<b>XV. MANAGEMENT AND SUPERVISION</b>										
C62	Regular Operation Evaluation		X		X		X	Feb-08	Aug-08	
C63	Operation in Compliance with Risk Management Plan						X	Aug-06	-	Subparagraphs separately assessed beg. Feb 2007
	a. Risk Management Database (paragraphs 79-90)		X		X		X	Feb-08	Aug-08	
	b. Performance Evaluation System (paragraph 91)		NYE		NYE		NYE	Feb-08	Aug-08	
	c. Auditing Protocol (paragraphs 92-99)		X		X		X	Feb-08	Aug-08	
	d. Regular and Periodic Review of All DPD Policies		✓		✓		✓	Feb-08	Aug-08	
	e. Regular meetings of DPD managementDPD		✓		X		✓	Feb-08	Aug-08	
C64	Video Camera Policy		X		X		X	Feb-08	Aug-08	In compliance with policy requirements
C65	a. Holding Cell UOF Investigations Audit		X		✓	X	X	Feb-08	Aug-08	Non-compliance due to non-submission of audit
	b. Holding Cell Prisoner Injuries Investigations Audit	✓	NYE		X	✓	✓	May-08	Aug-08	
	c. Holding Cell Misconduct Investigations Audit	✓	NYE	✓	NYE	✓	✓	May-08	Aug-08	
C66	HCCC Requirement		✓	DW	X		✓	Feb-08	Aug-08	
	FSP Audit Requirement	✓	NYE	✓	NYE	✓	✓	May-08	Aug-08	
C67	HCCC Emergency Preparedness Audit	✓	NYE	✓	NYE	✓	✓	May-08	Aug-08	
C68	HCCC Medical/Mental Health Audit		X		X		X	Feb-08	Aug-08	
C69	HCCC Detainee Safety Audit		✓		X	X	✓	Feb-08	Aug-08	
C70	HCCC Environmental Health and Safety Audit	✓	NYE		✓		✓	May-08	Aug-08	
C71	HCCC Food Service Audit	✓	NYE		✓		✓	May-08	Aug-08	
C72	Audit Reporting Requirements	X		X		X	X	May-08	Nov-08	

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<b>XVI. TRAINING</b>									
C73				X		X	Aug-07	Aug-08	
C74	X		X		X	X	May-08	Nov-08	
C75				X		X	Aug-07	Aug-08	
C76				X		X	Aug-07	Aug-08	
C77				X		X	Aug-07	Aug-08	
C78				X		X	Aug-07	Aug-08	
<b>XVII. MONITORING AND REPORTING</b>							76.00		
C79 - 93									No monitoring requirements
C94				-	-	-	May-07	-	Compliance will be assessed as needed
C95 - 99									No monitoring requirements
<b>XVIII. STIPULATION PURSUANT TO THE PRISON LITIGATION REFORM ACT, 18 U.S.C. 3626</b>									
C100 - 102									No monitoring requirements
<b>XIX. IMPLEMENTATION AND ENFORCEMENT</b>									
C103 - 110									No monitoring requirements
<b>XX. MISCELLANEOUS</b>									
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.

[2] For those paragraphs that require specific audits, the next expected evaluation shown is the quarter in which the next scheduled audit is due and/or is expected to be evaluated (based on the date the audit is expected to be submitted).