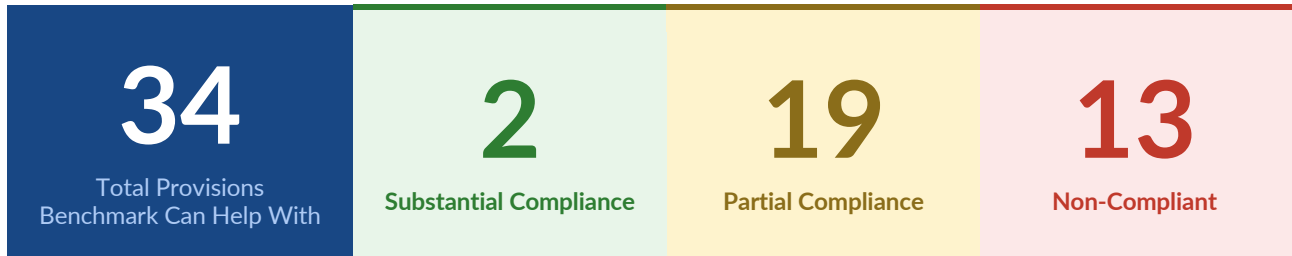


## Compliance Status: Where Benchmark Closes the Gap

The Monitor's Second Report (filed February 20, 2026) evaluated FCSO against every provision of the Consent Decree. Across the 34 provisions where Benchmark's platform directly addresses compliance requirements – spanning staffing oversight, use of force, investigations, early intervention, officer wellness, and quality assurance – the Monitor's findings reveal significant work ahead. Only 2 of the 34 have reached Substantial Compliance. The status breakdown is highlighted in the summary chart below, followed by a full provision-by-provision mapping of a subsection of the requirements, the Monitor's findings, and the Benchmark solution.



Paragraph	Status	Requirement	Monitor's Finding	Benchmark Solution
¶ 37	Partial Compliance	Document all staff trainings and certify each staff member attended required training and demonstrated competency.	<i>Training tracked via "manual process with handwritten forms." Monitor recommends "an electronic method for tracking staff training."</i>	LMS
¶ 38	Partial Compliance	Fully train all Custody Staff before allowing any officer to work without direct supervision in a housing unit.	FCSO <i>"did not have records responsive"</i> to a request about whether staff working without direct supervision had completed required training. No system linking training completion to assignment eligibility.	LMS Officer Profile
¶ 39	Partial Compliance	Train all supervisory and leadership personnel in supervision requirements and leadership skills.	<i>"No responsive records exist"</i> re: supervisory training audits. Supervisory training tracking requires a comprehensive update.	LMS
¶¶ 82–83	Partial Compliance	Grievance acknowledgement within 24 hrs; final decision within 7 days.	Grievance system exists but timeline enforcement is inconsistent. Grievance and incident data stored in separate systems with no cross-referencing.	First Sign Policy Alerts
¶ 93	Non-Compliant	Examine incident data for patterns and trends by floor, group, shift; identify remedial measures.	<i>"Incident reports, grievances, internal investigations... are all captured in different systems or repositories... This fragmentation makes it extremely difficult... to identify patterns or trends."</i>	First Sign

Paragraph	Status	Requirement	Monitor's Finding	Benchmark Solution
¶ 124	Partial Compliance	Track all grievances; analyze for patterns to prevent violence.	Grievance system not connected to incident or UoF systems - preventing cross-system pattern analysis required by this provision.	First Sign
¶¶ 131-133	Partial Compliance	Supervisory review training; document all training.	Training records are the same handwritten system cited in ¶137.	LMS
¶ 148	Partial Compliance	Develop a system tracking all UoF by staff member + related complaints/grievances.	"No direct connection between use of force grievances, the use of force review system, and the employee early warning system."	First Sign
¶ 150	Non-Compliant	Every 6 months: analyze force data for underreporting and staff/unit-specific trends; submit to Monitor.	FCSO "does not conduct meaningful evaluations of use-of-force data trends."	First Sign
¶ 151	Partial Compliance	Effective Early Warning System screening UoF, complaints, grievances by staff member. 6-month flagged list to Monitor.	EWS exists but "does not include grievance allegations and complaints received from external sources." Monitor: EWS "requires significant updates."	First Sign
¶ 294	Non-Compliant	QA program collects and analyzes data for patterns and trends; develops corrective action plans with timeframes, etc.	No operational corrective action planning process in place. Pattern analysis cannot occur without unified data infrastructure.	First Sign

The Monitor's Second Report rates ¶151 at **Partial Compliance** – acknowledging early steps while making clear that a fully operational EWS has not yet been achieved. In our experience working with agencies under active consent decrees, reaching full compliance on EIS requirements requires a purpose-built, research-based system. **First Sign® is the only research-based EIS on the market**, and it is the standard the Monitor and DOJ expect to see in place to close this provision.