



**Effective
Law Enforcement**
for **ALL**

INDEPENDENT EVALUATOR PROGRESS REVIEW REPORT

**MINNEAPOLIS POLICE DEPARTMENT
& THE CITY OF MINNEAPOLIS**

REVIEW PERIOD

April 1, 2025 – September 30, 2025

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Executive Summary

During the period covered by this report, April 1, 2025 to September 30, 2025 (the Review Period), the City and the Minneapolis Police Department (MPD) have made measurable and meaningful progress in laying the foundation necessary to achieve the Settlement Agreement's (SA) goals. MPD personnel are working hard to fulfill their responsibilities with respect to implementation. Further progress, however, has been hindered by lack of coordination within the MPD and with other City entities, lack of communication by MPD leadership concerning implementation, overburdened staff, and lack of resources.

Whatever the shortcomings may be, however, we do not attribute them to lack of commitment by the City or the MPD. We have discussed the issues with them, and they are working to address them. Moreover, it is important to acknowledge the many City and MPD personnel, sworn and non-sworn, who not only support the Agreement's goals but are working hard and conscientiously to implement its requirements. We appreciate and applaud their efforts, and the efforts of our MDHR colleagues.

Moreover, the progress—or lack thereof—must be evaluated in the context of the major institutional changes the Agreement requires. The lesson from prior consent decrees is that institutional transformation is complex, challenging, and rarely proceeds as rapidly as the parties to the agreements hope at the outset. This reality clashes with the public's equally real impatience for change and skepticism that it will occur. The goal, and challenge, is to manage these two realities so that public confidence grows through the transformation process. While this is no easy task, commitment, consistency, accountability, and transparency are essential elements of the solution. This Progress Review is part of meeting that challenge.

Progress Made by the City and MPD Under the Evaluation Plan

Achievements and challenges observed in this Review Period are summarized below and discussed in more detail in Section 1.

Achievements

- **Policy and Procedure Approvals.** The following policies and procedures were approved during this reporting period:
 - 7-350, Emergency Medical Response
 - 5-104, Non-Discriminatory Policing
 - 5-109, Procedural Justice and Professional Policing
 - 3-501, Member Health and Wellness
 - 3-502, Member Medical Information, Injury, and Incident Response
 - Minneapolis Police Misconduct Investigation Manual: MPD Internal Affairs
 - Minneapolis Police Misconduct Investigation Manual: Office of Police Conduct Review
 - 4-223, Body Worn Cameras and In-Car Cameras
 - 4-508, BWC and ICC Data Management

In June, MPD posted on its website the 17 approved use of force policies, along with the approved crisis intervention and emergency medical response policies. In July, MPD posted the approved departmental Mission, Vision, Values, and Goals. In September, it posted the approved non-discriminatory policing policies online.

- **Training Development.** MPD and the City have been working with vendors and departmental subject-matter experts to develop the following training curricula:
 - Use of Force (approved)
 - Supervisor Leadership (approved)
 - Non-Discriminatory Policing (On-track)
 - Health, Wellness, and Introduction to Early Intervention Systems (On-track/In Progress)
 - Crisis Intervention training for
 - Current MPD officers (8-hour refresher training) (under review)
 - New MPD officers (40-hour course) (under review)
 - 911 call-takers and dispatchers (under review)
- **Progress toward implementing the MPD Policy and Resource Hub.** This application will make it significantly easier for MPD personnel and the public to access MPD's policies.
- **Use of Force Training Curriculum Approval.** MPD submitted and received approval of the training curriculum for Use of Force (UOF). We observed the training and found that it satisfied the Agreement's requirements.
- **Facilities Plan Progress.** The Facilities, Equipment and Non-Database Technology Plan was approved. The City and MPD made noteworthy progress implementing their

Facilities, Equipment, and Non-Database Technology Plan, although with respect to moving personnel in the Grain Exchange Building the City will need to demonstrate that concerns about water quality have been resolved to avoid a finding of non-compliance with paragraph 251.

- **Employee Wellness Training and Service Delivery Progress.** MPD submitted draft training curricula for the Health and Wellness and Introduction to EIS In-service training for us and MDHR to review.
- **Peer Support Team Deployed.** MPD's new Peer Support Team was deployed to multiple traumatic incidents and received positive feedback, though the full launch of the team awaits approval of the Peer Support Policy, onboarding of the Peer Support team lead, and the execution of the contract for the clinical lead vendor who will be responsible for training and clinical oversight of the Peer support team.

Challenges

- **Lack of Coordinated Leadership.** Implementation of some requirements has been hindered due to lack of coordination between the MPD and/or City units. We have observed siloed information and decision making, and key individuals overburdened with responsibility to manage multiple tasks. Disciplinary decisions have also been delayed due to administrative requirements that require coordination from multiple stakeholders.
- **Failure to Communicate.** MPD focus groups and informal discussions with MPD personnel have revealed that MPD personnel continue to have many misunderstandings and misconceptions concerning the Agreement and our role under the Agreement. These misunderstandings contribute to a misperception that the changes required under the Agreement are being forced on the Department, rather than reflecting improvements the MPD is committed to making to improve the delivery of public safety services for the benefit of MPD personnel and the public they serve.
- **Policy Writing Capacity and Efficiency.** Despite progress, we noted ongoing bottlenecks in MPD's policy development, with too few staff handling too many assignments, resulting in slower than expected turnaround times and delays in reviews and approvals.
- **Misconduct Case Backlog Reduction Progressing Unevenly.** Both IA and OPCR have yet to eliminate their historical case backlogs, though OPCR showed marked improvement in timeliness and capacity.
- **Lack of Approved Field Training Officer (FTO) Standard Operating Procedures (SOP):** The absence of an approved SOP continues to delay implementation of the FTO program requirements outlined in the Agreement. This is a key area of concern given that the training provided to new recruits needs to be properly reinforced through the FTO program once they are assigned to a patrol district.
- **Lack of Dedicated Staffing to Implement the Employee Support Plan.** The Plan submitted by MPD requires additional dedicated staff for the Health and Wellness Unit that the City and MPD have not yet allocated.

- **Lack of Training Capacity Hindering Delivery of New Policy Instruction:** The current training staff capacity is inadequate to meet the Department’s ambitious Year Two training goals.

Year 1 Implementation Status

As the charts below show, the City and MPD have made important but uneven progress toward achieving the Year 1 and Year 2 implementation goals established under the Evaluation Plan. Year 1 goals are largely complete in several foundational areas—policy development, planning, and system design—while several critical items, such as backlog elimination in Internal Affairs and OPCR, remain in progress. Year 2 goals reflect a shift from planning to execution, emphasizing training delivery, implementation of approved policies, and activation of core systems such as the Early Intervention System, Employee Support Plan, and updated performance evaluation platform.

Management Goals

Status	Management Goal / Topic Area
Completed	IE Team launch of website (www.elefamn.org)
Completed	IE Team publication of Community Map
Completed	IE Team regular public meetings and publication of Semi-Annual Reports
Completed	MPD/City Completion of Data Systems Plan
Completed	MPD Completion of first Annual Master Training Plan and Training Needs Assessment
Off-Track/Still In-Progress	MPD/OPCR makes substantial progress toward or complete elimination of the IA/OPCR backlog
On-Track/Still In-Progress	MPD increased its ability to observe officer performance using BWCs & ICCs
Completed	MPD/City Completion of Equipment, Technology, and Facilities Response Plan and Commencement of initial improvements to precinct facilities

Policy Revision Goals¹

Status	Policy Revision Goal / Topic Area
Approved by IE	Mission/Vision/Values & Goals
Approved by IE	Use of Force
Approved by IE	Non-Discriminatory Policing
Approved by IE	Body Worn Cameras/In Car Cameras
Approved by IE	Officer Health, Wellness & Safety
Approved by IE	SOPs on Internal Affairs and OPCR procedures
Off-Track/In-Progress	Misconduct and Accountability
Off-track/In-Progress	Stops, Searches, Citations, and Arrests – 9-100s & 9-200s
Off-Track/In-Progress	Stops, Searches, Citations, and Arrests - Warrants

¹ Three additional items were added to this list, “Training Policies” which is a component of the original goal for the Field Training Officer Program, “Peer Support” which is a component of the original goal for the Officer Health, Wellness & Safety policy, and Warrants to differentiate the level of progress compared to other Stops, Searches, Citations, and Arrest related policy revision topics.

Off-Track/In-Progress	Field Training Officer Program SOP
Off-Track/In-Progress	Training Policies
Off-Track/In-Progress	Early Intervention System ²
Off-Track/In-Progress	Disciplinary Matrix
Off-Track/In-Progress	Quarterly Review Panels ³
Off-Track/In-Progress	Peer Support ⁴
Postponed ⁵	Engaging with Minors

Training Development and Delivery Goals

Status	Training Development and Delivery Goal / Topic Area
Postponed	Engaging with Minors
Off-Track/In Progress	Supervisory/Leadership Training
Off-Track/In Progress	Crisis Intervention Refresher Training

Status of Year 2 Implementation Goals

Management Goals

Status	Management Goal / Topic Area
On-Track/In-Progress	MPD improvements to public facing data dashboards
On-Track ⁶	MPD/City continued implementation of the Equipment, Technology, and Facilities Response Plan
On-Track	MPD/City continued implementation of Database Systems Plan
At Risk ⁷	MPD/City continued implementation of the Employee Support Plan
On-Track	IE Team Completion of annual community evaluation survey and officer survey
On-Track	IE Team Public Meetings and Publication of Semi-Annual Reports
Off-track/In-Progress	Updated IA/OPCR Misconduct Case Management System(s)
On-Track	Updated Use of Force Reporting Module
On-Track	Implementation of EIS Phase 1

Policy Revision Goals

Status	Policy Revision Goal / Topic Area
Approved	Crisis Intervention
At Risk	Critical Incidents
At Risk	Supervisor Duties/Responsibilities
At Risk	Performance Evaluations
On-Track/In-Progress	Social Media Use

² Policy was approved by the IE on January 2, 2026, after the reporting period but prior to publication.

³ Policy was approved by the IE on January 2, 2026, after the reporting period but prior to publication of this report.

⁴ Policy was approved by the IE on November 6, 2025, after the reporting period but prior to publication of this report.

⁵ Engaging with Minors policy revisions were postponed to coordinate changes with Stop/Search/Citation/Arrest policies for interactions with adult subjects, which are also still in-progress.

⁶ Provided the City can provide a schedule of reassessments that will be conducted by city and external inspections before the end of the next review period, this item will remain on On-Track, otherwise, it will be updated to "At Risk" during the next review period report.

⁷ The Employee Support Plan has been approved by us, but due to the lack of adequate staff funding we consider the continued implementation of the Plan to be At-Risk.

Training Development and Delivery Goals

Status	Training Development and Delivery Goal / Topic Area
Off-Track/In-Progress	Stops/Searches/Citations/Arrests
On-Track/In-Progress	Supervisory Duties/Responsibilities
Off-Track/In-Progress	Crisis Intervention (MECC & MPD)
Off-track/In-Progress	Critical Incidents
On-Track/In-Progress	Body Worn Cameras and In Car Cameras
On-Track/In-Progress	Use of Force
On-Track	Non-Discriminatory Policing
Off-track/Not Yet started	Internal Affairs & OPCR Investigative Procedures
Off-track	Corrective Action Matrix
On-Track/In-Progress	Officer Wellness, Support, and Safety
Off-Track/In-Progress	Early Intervention System
Off-Track/Not Yet Started	Performance Evaluations

1. Progress made by the City and MPD under the Evaluation Plan.

Policy-Related Activities (Part 2)

Policies Approved During the Review Period

The following summary shows the policy work during the reporting period. More detail regarding the efforts made on each policy is provided in Section 2 of this report.

As of September 30, 2025, MPD and the City completed and received IE approval on the following policies (listed in order of approval):

- 7-350, Emergency Medical Response
- 5-104, Non-Discriminatory Policing
- 5-109, Procedural Justice and Professional Policing
- 3-501, Member Health and Wellness
- 3-502, Member Medical Information, Injury, and Incident Response
- Minneapolis Police Misconduct Investigation Manual: MPD Internal Affairs
- Minneapolis Police Misconduct Investigation Manual: Office of Police Conduct Review
- 4-223, Body Worn Cameras and In-Car Cameras
- 4-508, BWC and ICC Data Management

Additionally, during use of force in-service training, MPD members identified certain policy language they considered unclear, and that would benefit from clarification, additional explanation, or context. The MPD considered this feedback and proposed clarifying language to us and MDHR, both of whom agreed that considering these revisions furthers the goal of creating clear and concise policies.

NOTE: While these use of force policies have been *approved*, they will not become active policies for which members will be held accountable until after the entire department has completed training on them.

Policies and SOPs Still in Progress

We are actively collaborating and workshopping with the Parties on the following policies and SOPs:

- 2-601, Quarterly Review Panel
- 9-100s & 9-200s, Stops, Searches, Arrests & Citations
- 2-203, Early Intervention System
- Training policies (2-500s)
- Field Training Officer Program SOP
- MPD Misconduct and Accountability policies (2-100s)

As of September 30, 2025, the MPD, the City, and we were engaged in an informal feedback phase of work on this policy:

- Warrants (9-300s)

The MPD and City report that they have made extensive edits to the following documents; however, we have not yet reviewed the latest versions:

- Disciplinary Matrix
- Critical Incident Communications Plan

Lastly, the MPD reports that it has been working internally on updating policy drafts that cover the below topics during this reporting period but has yet to provide initial drafts for feedback:

- Critical Incidents
- Supervisory Duties & Responsibilities
- Social Media Use in Investigations
- Engaging with Minors
- Foot Pursuits
- Early Intervention System SOP
- BWC Compliance SOP

Draft Policies Posted for Public Feedback

During the Review Period, the MPD posted the following Agreement-related policies on its website for public feedback, for the time indicated:

- Early Intervention System Policy (30-days)
- Quarterly Review Panels (30-days)
- Disciplinary Matrix (30-days)
- Member Health & Wellness policies (30-days)
- Peer Support (30-days)
- Limitations on Hours Worked (30-days)
- Witnesses (45-days)

As stated in previous semi-annual reports, the Agreement, ¶ 28, requires only those policies identified as core policies in the Agreement to be publicly posted for 45 days (about 1 and a half months). Although the MPD is not required to post non-core policies for public comment, it has agreed to post them for 30 days (about 4 weeks). MPD posts its policies for public comment on this webpage: [Police Policies & Feedback - City of Minneapolis](#).

In June, the MPD posted on its website the 17 approved use of force policies, along with the approved crisis intervention and emergency medical response policies. In July, the MPD posted the approved departmental Mission, Vision, Values and Goals, and in September, the approved non-discriminatory policing policies were posted.

The Minneapolis community expressed its eagerness to learn about how its feedback regarding use of force policies was considered by the MPD and how feedback was applied to policies. In July, the MPD posted an extensive accounting of the public feedback it received on force policies, along with its responses to that feedback. This accounting

showed how public feedback was considered and what was included in the approved policies. This information can be found on the City's website on the page titled: [Considerations for Community Feedback](#). While we had hoped the MPD would have been able to provide this information to the public sooner, it is apparent from the amount of detail included in its response that the MPD devoted significant effort to addressing the ample feedback received.

As a reminder, the public can also be kept informed of the MPD's milestones regarding policy through its [Implementation Updates](#) webpage.

Officer Feedback

In addition to gathering community feedback, the MPD also solicits officer and supervisor feedback on draft policies to inform the policy development process. MPD hosts regular focus groups – separate sessions for officers and supervisors – to review draft policies and elicit their feedback.

During the Review Period, the MPD hosted six officer focus groups and nine supervisor focus groups. The MPD provides us with a list of the feedback for each policy submission and whether the feedback has been incorporated into the policy.

Providing the opportunity for feedback is important and much of it has been constructive. Too often, however, the discussion has not been directed at the policy language but instead becomes focused on complaints that the policy should not be revised, how it will lead to unfair investigations and discipline, or other tangential issues, making the time that is set aside for officer feedback less productive. We encourage the MPD's focus group facilitators to target and redirect the discussion, as needed, on how members' feedback could translate into constructive suggestions for updated policy language. We recommend the focus group makeup also include a sworn representative of higher rank to facilitate group discussions.

Policy Management Software Progress

During this Review Period, the MPD made considerable progress toward implementing its new policy management software, the *MPD Policy and Resource Hub*, which has been a significant focus of the MPD Implementation Unit and Policy Team over the reporting period. In July, MPD distributed an announcement to its officers promoting the features of the Policy and Resource Hub. The announcement highlighted several features of the new system, including the ability to display and view specific policies (without having to review the entire policy manual); a central glossary of terms that will be visible when hovering over a defined term; dynamic and robust search features; and links to other policies, Minneapolis local ordinances, and Minnesota state statutes, among other features. Along with the announcement, MPD distributed a video to provide a preview of the new system interface to MPD members. If deployed effectively, MPD members and the public will have a more user-friendly tool to access MPD policies and related information. MPD plans to launch the software with the activation of its new use of force policies.

MPD's Policy and SOP Development Efficiency and Capacity Challenges

While MPD continues to make progress revising its policies, there continue to be challenges that impede the drafting and collaboration process. In some cases, MPD has taken a long time to return drafts to us. This occurred, for example, on directives such as the Warrants policy, which took more than five months for MPD to return, and the Field Training Officer SOP, which MPD took six weeks to return after we provided extensive technical assistance. There have also been multiple instances in which a document was returned to us but had not been carefully proofread for clarity, consistency, or formatting issues prior to submitting it for our formal compliance evaluation.

We have been unable to identify the specific reason that certain items have been delayed; however, we observe that MPD continues to task too few people with the vast majority of its policy revision work, resulting in bottlenecks. For example, during the Review Period, key individuals tasked with the policy work were also responsible for serving as the primary implementers of the Policy and Resource Hub, as described above. We have also observed communication challenges and apparent siloing of information and decision making among MPD units and with City stakeholders. We also continue to observe lags in MPD's chain of command approval processes, which we reported in previous Progress Reviews.

MPD is improving the process, however. For example, MPD is developing timelines to promote more accountability and predictability in the policy development process. We encourage MPD leadership to continue to identify the sources of bottlenecks and constraints to expedite the policy drafting process.

It must be appreciated that the policy revision process is unavoidably lengthy and complex. Writing clear, concise policies that comply with the law, the Settlement Agreement, and are integrated with related policies is a daunting task. Moreover, MPD submissions of draft policies must consider input from MDHR and us, as we have approval authority. Overall, the magnitude of the policy revisions that are required, even under ideal conditions, can result in a prolonged process. While we urge the MPD and the Parties to continue to explore efficiencies, we also acknowledge and commend those responsible for drafting and reviewing the policies. They have been working diligently and collaboratively throughout the process.

Non-Discriminatory Policing (Part 3)

Non-Discriminatory Policing Policy and Procedural Justice Policies Approved

MPD received approval of Policy 5-104, Non-Discriminatory Policing, and Policy 5-109, Procedural Justice, and Professional Policing. We look forward to assessing the non-discriminatory policing training (both the curriculum and the quality of delivery) and subsequently observing and assessing the impact implementation of these policies has on officer performance.

Performance Evaluation System

Part Three requires MPD to update its performance evaluation procedures and systems. The City has selected a vendor to develop a performance evaluation system to meet these requirements; the same vendor selected to implement the EIS and the IA/OPCR case management system. We urge the City to coordinate with the vendor to ensure that the appropriate level of support resources is dedicated to each project so that implementation schedules are not negatively impacted by staffing deficiencies. At the appropriate time, we will evaluate the performance evaluation system to determine if it meets the requirements of Part 3.

Use of Force Related Activities (Part 4)

Use of Force Training

MPD has begun delivering updated use of force training based on the revised policies we approved. The training consists of 24 hours, provided over three days. MPD anticipates that most members will have been trained by the end of October 2025 and that make-up training will be completed in December. The policy is expected to be implemented in January 2026.

MPD reports that it allows non-sworn members of the Implementation Unit and other compliance functions to observe UOF training to enhance their skills and knowledge of UOF principles.

Force Investigation Team (FIT) Unit Staffing

The FIT Unit currently has 7 full-time personnel assigned:

- Commander (1);
- Lieutenant (1);
- Sergeants (2);
- Police Officer (1); and
- Civilian case investigators (2)

In September, MPD transferred an additional Sergeant into the FIT Unit, which will increase the overall personnel count to eight. At a time when staffing constraints continue to challenge MPD on multiple fronts, ELEFA commends the MPD for making this difficult decision to prioritize this core function for ensuring compliance with new UOF policies. MPD and the City also approved a contract extension to the contracted legal firm that has been conducting FIT reviews.

It will be essential for the FIT unit to implement policies and procedures to govern how the unit operates.

Use of Force Reporting Quality Assurance Review Backlog

FIT indicated that due to significant staffing capacity and training deficiencies, a significant historical backlog in the UOF quality review process had developed over time. MPD reported that there were not enough staff dedicated to FIT to conduct the final reviews of UOF

incidents promptly. It should be noted, however, that these incidents had already been reviewed by field sergeants, and then by field lieutenants in accordance with policy. It is only the final quality assurance review (QAR) by the FIT Unit that has not yet been completed.

The FIT Unit was given additional staffing resources and contracted vendor support with the goal of clearing the QAR backlog by July 1, 2025. MPD did not meet this goal but reports it is making progress. For the purposes of data reporting, MPD categorizes its UOF case reviews into “current” status -- received by FIT within the past 30 days -- and “backlog” status -- received by FIT more than 30 days prior. FIT further classifies the Level 3 cases as critical or non-critical. FIT reports the following status of its case reviews that were completed from April 1, 2025 through September 30, 2025:

Status of Quality Assurance Reviews (Completed from April 1, 2025 through September 30, 2025)

Use of Force Level	Current Status	Backlog Status	Total Cases
Level 1	56 cases	55 cases	111 cases
Level 2 / Non-Critical Level 3	33 cases	17 cases	50 cases
Critical Incident Level 3	3 cases	8 cases	11 cases

QAR Cases that Resulted in Referral to IA

Use of Force Level	2023 Cases	2024 Cases	2025 Cases	Total
Level 1	--	3 cases	0 cases	3 cases
Level 2 / Non-Critical Level 3	--	22 cases	31 cases	53 cases ⁸
Critical Incident Level 3	3 cases	5 cases	1 case	9 cases

We have met regularly with MPD to provide technical assistance in managing its backlog reduction efforts. We will assess the data, the classification, and the quality of the reviews and report in a subsequent review.

FIT continues to express concern regarding its staffing level and whether it will be able to keep pace with the anticipated workload that will be generated by new UOF policies, which are expected to significantly increase the volume of Level 2 force review cases given that takedowns and neck touches will be reclassified from the Level 1 category to Level 2, which require more extensive review. Preliminary projections indicate that the new UOF Level definitions may double the number of Level 2 force cases generated, which would impact the volume of UOF case review backlogs again if not properly resourced. We recommend that MPD continue to closely monitor the case volume for FIT and determine whether additional staffing resources are required after the updated UOF policy goes into effect.

⁸ Includes three cases that occurred in the prior review period but were reviewed in this Review Period.

MPD Conducted Site Visits to Observe Force Review Boards in Other Jurisdictions

During the Review Period, MPD conducted a site visit to the Las Vegas Police Department and met virtually with the Albuquerque Police Department and the Baltimore Police Department on how they conduct their FRBs. It also recently visited neighboring St. Paul Police Department to observe its FRB and plans to observe an FRB on-site or virtually with the Los Angeles Police Department (LAPD) soon. We have provided MPD exemplars of LAPD FIT Investigations. MPD anticipates that it will evaluate all the information gathered from these various law enforcement agencies to inform the development of SOPs for FRB processes sometime during the next reporting period.

Critical Incident Response and Crisis Communication Plan Still Under Development

MPD and staff from the Office of Community Safety (OCS) continue to develop a new critical incident response policy and to incorporate relevant aspects of the policy into the City of Minneapolis' Crisis Communication Plan. The Crisis Communication Plan will outline how the MPD and the City of Minneapolis respond publicly to critical incidents such as officer involved shootings.

Stops, Searches, Citations, and Arrests Related Activities (Part 5)

Stop/Search/Citation/Arrest Policy Revisions

During the Review Period, we worked extensively with the parties on the 25 Stops, Searches, Arrests and Citations (SSCAs) policies that are covered in Part 5 of the Agreement:

- 9-101, Stops, Searches, Citations and Arrests Guiding Principles
- 9-102, Levels of Encounters Between the Police and the Public
- 9-103, Consensual Contacts: Voluntary Contacts and Field Interviews
- 9-104, Investigative Detentions
- 9-105, Weapons Pat-Downs
- 9-106, Traffic and Vehicle Stops
- 9-107, Disorderly Conduct and Obstruction of Legal Process
- 9-108, Public Recording of Police Activities
- 9-109, Warrantless Searches
- 9-111, Strip Searches and Body Cavity Searches
- 9-113, Supervisory Review of Stops, Searches, Citations and Arrests
- 9-201, Overview of Adult Citations and Arrest Procedures
- 9-202, Procedures for Adult Citations and Misdemeanor Arrests
- 9-203, Booking Authorization and Procedures
- 9-204, Arrests for Driving While Intoxicated (DWI)
- 9-205, Private Person Making an Arrest (Citizen's Arrest)
- 9-206, Arrest or Detention of Adults in Need of Medical Attention
- 9-207, Submitting Reports for Citations and Arrests

- 9-208, Legislative Immunity
- 9-209, Diplomatic and Consular Immunity
- 9-210, Arrest or Detention of Foreign Nationals
- 9-211, Federal Arrestees
- 9-301, Search Warrants
- 9-302, Arrest Warrants
- Transportation of Detained People (formerly 9-108)

Given the breadth of this task, the effort has been divided into separate workstreams, to manage content revisions more effectively. On each individual policy within the SSCA framework, many versions of policy language have been exchanged, and we have held multiple meetings with the parties to discuss the revisions. The primary focus has been to complete policy chapters 9-100 (Stops & Searches) and 9-200 (Arrests and Citations). These policies are near final. Chapter 9-300 (Warrants) requires additional work.

Once these policies are approved, MPD should be able to complete its SSCA training curricula and then deliver the training. MPD plans to then revisit the Engaging with Minors policies. Work on these was paused, pending the completion of the SSCA policy revisions, because the SSCA policies provide the foundation for officer stops. Once that foundation is established, MPD will be able to analyze what additional policy provisions are necessary to guide interactions with youth, who require certain considerations given they are a more vulnerable population than adults.

Body Worn Cameras and In-Car Cameras (Part 6)

Body Worn Camera and In-Car Camera Policies Approved

The MPD completed, and we approved Policy 4-223, Body Worn Cameras (BWC) and In-Car Cameras (ICC), and Policy 4-508, BWC and ICC Data Management. MPD is working on development of training curriculum on these updated policies, which they anticipate will be completed during the new review period.

MPD Audits for BWC Startup Checks

We met with the MPD Implementation Unit to discuss the procedures for auditing body-worn cameras, including reviews of whether officers checked to ensure their camera was working at the beginning of the shift (startup check) and whether they activated as required by policy when responding to calls for service.

Our preliminary review of the BWC audit methodology revealed that there were multiple instances in which members completed startup checks mid-shift—not at the beginning of the shift as required by policy. In a sample of 15 randomly selected officers from the first precinct who performed BWC startup checks, we directly observed four instances where these checks occurred more than 90 minutes (about 3 hours) after the beginning of the shift and only after one or more calls for service had been answered and BWC video taken. While this is a small, non-statistically valid, sample, it suggests that failure to conduct startup checks at the beginning of the shift may be a broader problem. Future startup check audits

will include whether the checks occurred at the beginning of the shift and before any calls for service were answered, whether MPD audits identified any non-compliance with policy, and, if so, whether appropriate correction action was taken.

MPD Audits for BWC Activation for Calls for Service

MPD worked with the City IT Department to develop a method for reviewing BWC activations that move beyond random sampling. MPD is now able to identify every instance in which an eligible CAD entry lacks a properly labeled BWC matching record. During the Review Period, the Implementation Unit demonstrated its method for reviewing BWC activations, which will be incorporated into its BWC Audit SOP. Monthly reviews of every eligible CAD record are conducted, and MPD members are identified if they have 5% or greater calls for service without a BWC record. These members are then required to verify, in writing, whether a BWC recording exists (and was just not properly labeled) or does not exist, and whether the reason is within policy. These explanations are then reviewed by their supervisor and then again by BWC specialists in the Implementation Unit for appropriateness. Overall, we are impressed by the extent to which MPD, and the City have used technology resources to develop their audit methodology. MPD anticipates providing us and MDHR with updated SOPs for review and approval during the next Review Period.

Training-Related Activities (Part 7)

2026 Training Needs Assessment and Annual Training Plan on Track for Approval

We reviewed and commented upon MPD's 2026 Training Needs Assessment (TNA) and Annual Training Plan (ATP). Both documents follow the format agreed upon last year by the Parties and us. The TNA process involves the following steps: 1) conducting a Nation-wide law enforcement trends analysis to determine what training topics are being addressed by law enforcement agencies across the nation; 2) conducting ten different interview sessions with internal and external stakeholders to determine what topics they believe MPD should focus upon in developing curriculum; and 3) analyzing all of this data to develop training objectives that will be ranked from a low to high priority. All high priority and most of the mid priority training objectives will be developed into curriculum to be delivered in the next calendar year as part of the ATP.

The ATP outlines how the department will develop and deliver the training classes and courses that address the high-priority training objectives identified in the TNA and the training mandates required by the Agreement and Minnesota-POST. As of the end of the Review Period, both the TNA and the ATP are awaiting approval by the Chief of Police. While awaiting that approval, however, MPD is moving forward with developing the curriculum for the training classes, to meet the training delivery timelines within the 2026 ATP. MPD will need to obtain approval of the curriculum before the training is delivered.

The Professional Advisory Committee (PAC) for Training

The PAC is made up of local university professors, State of Minnesota training experts, and various subject matter experts such as mental health professionals that meet on a quarterly basis at the Police Academy to discuss ways they can assist MPD in developing and

delivering more professional training. The Director of Police Training and Education initiated the first meeting of the PAC during this reporting period. The PAC has been given all recently developed training curricula to review and provide feedback.

PAC members also taught Active Bystandership for Law Enforcement (ABLE) at the pre-service Academy and have played a key role in advising the Director on training development. We expect the PAC will prove to be a great asset to MPD in their development and delivery of future pre-service Academy and in-service training curriculum.

Field Training Officer Program

MPD continued editing its SOP for the FTO Program. Due to some changes in personnel, the responsibility of SOP drafting was assigned to MPD's Training Division personnel. Progress on this SOP has been slower than anticipated. We have provided MPD with extensive technical assistance drafting this document; nevertheless, MPD has been slow to incorporate edits and return revised versions for review and approval. The lack of an approved FTO SOP continues to delay the implementation of an Agreement-compliant version of this critical program. Setbacks in finalizing this SOP have also delayed the completion of the related training policies, also required by the Agreement. We will continue to monitor this effort and provide technical assistance as requested by the MPD.

Crisis Intervention Training

MPD, through its vendor, had still not incorporated our suggested revisions to the 2025 Crisis Intervention Team (CIT) 8-hour refresher training class curriculum. We are awaiting re-submission of the CIT training, which requires our review and approval before the training is delivered. Failure to do so would result in this training continuing to be categorized as non-compliant with the Agreement. We continue to monitor this issue.

During this reporting period, we began reviewing the 40-hour CIT Training for new hires, and the MECC crisis intervention training given to 911 call-takers and dispatchers. These training curricula will require our approval before training can commence.

The scenario-based training portion of the classes, which uses professional actors, is exceptional. The scenarios are co-facilitated by a sworn law enforcement officer and a clinician representative, which bring together important learning opportunities for practicing skills. All the MN-CIT instructors are mental health professionals and experts in training content. The overall content of these training courses covers pertinent topics in a CIT Refresher, 40-hour Basic CIT and CIT for tele-communicators, and deficiencies in prior iterations of the training have largely been addressed. As previously reported, however, the absence of a law enforcement co-facilitator, not just for the scenario-based exercises, is a critical missing factor, as it can facilitate discussion among classroom participants and establish credibility to the content based on lived experience in law enforcement.

Misconduct Training Curriculum Development

MPD has been developing a 40-hour misconduct investigations course that all new IA and OPCR personnel will be required to attend. Unfortunately, IA f experienced capacity issues and were unable to devote sufficient time to developing the curriculum for this course within a reasonable time. As a result, in September 2025, the City issued a Request for Proposals (RFP) to identify additional contracted capacity to complete this training development more effectively. The selection of a vendor is expected to occur in the next reporting period. Misconduct investigations training is projected to begin during 2026.

Supervisor Leadership Training

We evaluated the initial supervisor leadership training curriculum and provided feedback to the selected training vendor. The vendor then conducted a pilot training session with selected students and held a debriefing session with us. Based on our feedback, the vendor modified the curriculum, and a final training product was provided to us and MDHR for review. We approved the final curriculum and observed the training.

Use of Force Training Delivery

MPD has been conducting use of force training. Day-1 training focused on the new or revised UOF policy provisions and establishing the principles of sanctity of life and procedural justice, as the basis for all training scenario debriefings. MPD created two workbooks to support the training, one that had all the new or revised UOF policies in it, and one that had all the guiding principles as well as several other visuals and charts that explained UOF principles in detail. One guiding principle is the Critical-Decision Making (CDM) Model, which officers must use to analyze whether and what level of force is appropriate. We observed and approved the delivery of this training.

Day-2 focused on Minnesota-POST psychomotor skills-based training requirements. MPD used a vendor well known in the State of Minnesota for presenting psychomotor skills-based training such as Arrest and Control (ARCON) techniques, ground grappling, and various hand and arm control techniques. MPD also used this training to introduce the new Taser 10 less-lethal weapon. All MPD officers who participated in this training were certified on this weapon system. We observed and approved the delivery of this training.

Day-3 was heavily scenario-based, which required the students to go through several UOF scenarios including deadly force and duty to intervene and use the CDM Model (as well as the guiding principles) to solve the scenarios. The students also went through six different traffic stop scenarios and an expanding incident scenario that required the students to develop a tactical plan to effectively resolve the incident. The training was on track for completion in August, however, there was a change to the lead instructor, and the training was rescheduled to September so that another instructor (who had previous training schedule commitments) would be available to conduct the training. We observed the new lead instructor delivering the training in September and approved it. It is anticipated that all the UOF training will be completed within the next reporting period.

Field Training Officer Program

We are assisting the Director, Police Training and Education, to develop an FTO SOP and a new 40-hour FTO Training Course that will be given to all newly promoted FTOs before they are assigned to field operations. It is anticipated that the FTO SOP will be completed during the next reporting period, and the 40-hour FTO training curriculum workshopping will start soon thereafter.

Supervisor Force Review Training

We assisted the Force Investigation Team (FIT) develop an 8-hour Supervisor Force Review training class. We and MDHR reviewed the materials, and based on their feedback, MPD agreed to re-format the lesson plans and learning activities into a format more consistent with the recently approved Use of Force training documents. It is anticipated that the re-formatted lesson plan and learning activities will be approved and delivery of this training class will be completed by the next reporting period.

32-hour Non-Discriminatory Course

MPD hired a vendor to develop a 32-hour Non-Discriminatory Policing, Disorderly Conduct, and Obstruction of a Legal Process course. We met on-site for 8 hours with the vendor and MPD to discuss development and delivery of this important training. The vendor then developed an Expanded Course Outline (ECO) for the proposed training, and we provided feedback. The next step is for the vendor to develop lesson plans and learning activities based upon the ECO and provide these documents to us for review. The lesson plans and learning activities are projected to be developed by the next reporting period; however, training delivery is not expected to commence until year three.

Health, Wellness, and Early Intervention System Training

During the Review Period, we met with MPD curriculum designers and began workshopping the Health, Wellness, and introduction to EIS lesson plans and learning activities. Feedback was provided to the MPD.

MPD Presentation on Training Databases

We met on site with training division staff who manage the MPD's three training database systems. MPD provided a presentation on how each training database system operates. During the presentation, we randomly selected MPD personnel who had attended training and had the staff provide data from the appropriate databases to demonstrate that they were in the system correctly.

Officer Support and Wellness and Early Intervention (Part 8)

Employee Health and Wellness Policy Updates

MPD submitted the Member Health and Wellness policy, 3-501, and Member Medical Information, Injury, and Incident Response policy, 3-502. After extensive feedback from us and MDHR, and several meetings, we approved the revised policies. MPD also completed

an initial draft of the Peer Support policy, which was under review as of the end of September 2025.

Additionally, the EIS policy underwent extensive editing and review during this reporting period. Like several other policies in development, the EIS policy experienced delays in the editing process within MPD for quite some time. The latest round of feedback was provided by us to MPD in early July, yet an updated draft was not submitted by MPD until over two months later. As of the end of the Review Period, the EIS policy was still being revised by MPD.

Additional Staffing for Health and Wellness Unit Still Required

The MPD Health and Wellness Unit provided biweekly updates on its progress toward achieving the Agreement's goals and requirements, as related to Part 8. MPD added one additional staff member, bringing the total number of dedicated personnel to three members (2 sworn and 1 civilian). We remain concerned that the unit's staffing is insufficient for an agency MPD's size and the significant amount of work the Agreement requires. MPD has not allocated, nor has the City funded, all positions recommended in the Employee Support Plan, as required by ¶256. The City has cited budgetary restrictions as the reason for the stalled hiring, with the positions not included in the 2026-27 budget. The Agreement makes clear, however, the City's obligation to provide resources sufficient to implement its requirements. We have strongly encouraged the City, verbally and in writing, and again through this report, to provide the resources necessary to fulfill the Agreement's requirements, and to demonstrate the City's commitment to the health and wellness of MPD members.

The current personnel assigned to the Health and Wellness Unit, however, are a highly productive team, who are dedicated to furthering the mission of prioritizing health and wellness for MPD members. Our biweekly meetings with them are effective and well organized, with MPD coming prepared to show progress. We have some concerns about whether these personnel are receiving appropriate support and guidance. We encourage MPD leadership to carefully consider the organizational structure and leadership resources of the unit as it continues to grow. The vacant Director of Wellness position and Peer Support lead are crucial positions which should be prioritized. When considering new members of the Unit, MPD should ensure they are the right fit, understand the mission, and promote a collaborative work environment.

Vendor Selected to Provide Clinical Services to MPD Members

MPD and the City selected a vendor to provide the clinical services outlined in ¶¶ 253; 257-264 of the Agreement. The vendor, who had been serving in an interim role, has experience in providing clinical services to individuals, couples, and families. In addition to wellness check-ins, the vendor will provide critical and traumatic incident response, peer support team development, general oversight of wellness services, and wellness related training as requested by MPD. The contract for this service was still being finalized as of the end of this Review Period; MPD expects the new contract will be completed before the end of the next reporting period.

MPD Progress on Peer Support Program

The Peer Support Team provides confidential, one-on-one support to MPD employees navigating personal or professional challenges. Peer Support members are selected based on eligibility criteria including their personal and professional experiences, their ability to maintain confidentiality, provide empathy, and build and maintain trust. The current team represents a diverse range of ranks, units, and experiences within the department, both sworn and civilian. Twenty-one Peer Support members have completed the state-approved peer support training.

During this reporting period, the Peer Support Team was deployed to several traumatic incidents, including the tragic shooting at Annunciation Catholic School on August 27, 2025. The Health and Wellness Unit assessed these deployments to better inform how to fully operationalize the Peer Support policy. This policy is presently under IE review, and MPD anticipates finalizing it during the next reporting period. The policy must be approved prior to launching the program.

MPD is also in the process of implementing Cordico, a smartphone wellness application that provides mental health resources for MPD members. These resources include contact information for peer support members, clinical service providers, and wellness exercises. MPD anticipates that this will be a valuable tool for leveraging peer support resources and providing officers with access to wellness related information. The health and wellness training that is under development is also anticipated to include guidance to officers on how to use this application.

Employee Support Plan Implementation

MPD submitted its Employee Support Plan. While the content submitted has been reviewed by ELEFA, MPD has not yet achieved compliance with the plan due to a lack of staffing resources to support it. Once the unit is fully staffed, MPD will have a more sustainable path for achieving and sustaining the wellness-related requirements under Part 8 of the Agreement.

Facilities, Equipment and Non-Database Technology Plan

The City has invested significant effort and resources into the development and implementation of the Facilities, Equipment and Non-Database Technology Plan. The City produced a revised Facilities, Equipment and Non-Database Technology Plan, incorporating our feedback, which we then approved. The Plan has been rated as Partially Compliant, On-Track given the requirements of ¶¶246-247 to include facilities re-assessments every year. MPD and the City have determined these re-assessments will be completed annually by MPD and City personnel, and by an external vendor every three years. It should be noted that the original external vendor assessments under ¶246 were completed in 2023. As we approach the end of 2025, the annual reassessment is now overdue. Thus, this requirement is presently partially compliant, off-track. If the City cannot provide a schedule of reassessments before the end of the next Review Period, we may reconsider the current compliance rating for this item.

To address our concerns about reducing information siloing among City entities (MPD, Property Management, etc.) regarding facility improvements, the City and MPD established an executive steering committee made up of several key positions, including precinct leaders, property management personnel, along with senior City and MPD leadership, that meet monthly. Since the last reporting period, the committee has met five times and has reported that they find the collaboration to be highly effective. We regularly observe these meetings and commend the committee members for their dedication. The City has agreed to provide agendas, meeting minutes, and attendance records to provide documentation for future compliance assessments.

During the Review Period, we conducted virtual and on-site physical observations of several MPD facilities. The City and MPD will continue to send monthly progress updates to us and MDHR. Based on our observations, MPD and the City deserve credit for their commitment to this process and the resulting improvements to facility conditions across several MPD locations.

Despite the progress the City has made improving facilities, some important shortcomings remain. The Agreement requires that when MPD determines personnel must be relocated to a new or remodeled facility, the working conditions of the proposed new facility must meet the requirements for all MPD facilities, as outlined in ¶251. During this reporting period, the MPD and the City moved MPD personnel into the Grain Exchange Building, but MPD members affected by the move expressed concerns about the lack of potable water at the new location, as well as a broken refrigerator, which the City has since replaced. The City must demonstrate that potable water is available to MPD personnel to avoid a rating of non-compliance in this area. We have communicated to the City and MPD their responsibility to meet these requirements in advance of relocating a unit, and requested the appropriate steps be taken to retroactively implement them for the Grain Exchange Building. As of September 30, 2025, this had not been completed by the City. Future relocations that are implemented by MPD or the City that do not follow the requirements of ¶252 may result in us determining that MPD and the City are non-compliant with this paragraph.

Change Management Efforts to Support Early Intervention System Deployment

At the City's request, we are providing technical assistance to promote successful deployment of the EIS. As stated in previous Progress Reports, there has been considerable skepticism and anxiety expressed by MPD officers about the way the EIS will be used by MPD management. Given these concerns, the City and MPD have paused deploying the EIS, even though MPD reports that the development of the system itself has remained on schedule for Phase 1 completion.

Mental and Behavioral Health Crisis Support in the Field (Part 9)

Behavioral Health Response and Crisis Intervention Training

We met several times with the Commissioner of Community Safety, to better understand the City's history with Behavioral Health response, its priorities, limitations and associated national best practices. We also met with the Minneapolis Fire Department, which is now

providing oversight for Behavioral Crisis Response (BCR) services. We look forward to updated data and plans related to the Agreement's requirements. Continued collaboration among all the relevant entities related to this topic will be important to meeting the needs of the community and the requirements of the Agreement.

Paragraph 289 requires the BCR to demonstrate that its services reduce the workload of MPD members, that the BCR is responsive 24/7/365, and that the BCR has sufficient resources to meet the requirements of the Agreement. At present, there is insufficient validated data available for us to assess these requirements. MECC is improving its procedures for documenting unit availability and the impact of BCR call diversion to reduce workload on MPD members. Additionally, current MECC dispatch protocols are outdated and contain language that does not align with best practices.

At the reporting period's end, the MPD identified an MPD member to serve as CIT Coordinator. This is a positive development; however, the MPD member is currently assigned to a full-time patrol function and will likely face challenges in dedicating the time needed to be effective in this role. MPD reported that it anticipates creating a fully dedicated CIT position by January 2026.

Behavioral Health Response and Crisis Intervention Training Requires Further Improvement

As stated in the Training section of this report (Part 7), MPD had launched the CIT refresher training in 2025 prior to the court approved time for us to provide formal comments, which did not comply with the Agreement. This training was conducted, and we observed it on January 24, 2025. While overall the training was well done, there were several important components that needed to be modified. The training does an excellent job with scenario-based training, and some general content typical of refresher training, but the training relied heavily on PowerPoint presentations and lecture format rather than teaching methods better suited for adult learning, such as, using videos to help illustrate certain mental health symptoms or neurological responses, videos or exercises showing effective active listening or de-escalation strategies/tactics in law enforcement, simulation exercises when possible (for example, hearing voices), and testimony from people with lived experience, among other methods.

MPD spent too little time covering the critical decision-making model in the CIT refresher training. MPD teaches the CDM model as part of its Use of Force training, and it also has direct application to Crisis Intervention training. The training would also be more effective if an MPD sworn member co-presented this model. The anticipated assignment of a full-time MPD sworn member to serve as the CIT Coordinator could be a good fit for this role. We have observed that the CIT refresher training does not leverage a law enforcement/clinician co-facilitator structure, which is considered a best practice. We look forward to reviewing the revised CIT refresher training that is being produced for approval prior to its 2026 launch.

Additionally, we observed substantial portions of the 40-hour CIT training that are required for all new recruits. MPD formally submitted this training curriculum for MDHR and our review at the end of this reporting period. We provided written comments and completed a workshop session with the Parties and the contracted training vendor to review the feedback.

Overall, this 40-hour training session is consistent with best practices, but has room for additional improvement, which we anticipate can be incorporated into the training before the end of 2025. The training included a law enforcement co-lead (not from MPD), people with lived experience, and a panel of professionals representing community resources. It also utilized excellent scenario-based exercises and several highly relevant video examples, which MPD should adapt for the CIT refresher training as well.

Call Center Dispatchers and Crisis Intervention Training

To comply with ¶237 and ¶289, the Minneapolis Emergency Communications Center (MECC or 911 Call Center) must train dispatchers and their supervisors to identify, dispatch, and appropriately respond to calls for service that involve individuals in crisis. Additionally, ¶289 requires a “behavioral health crisis response team to better address the needs of individuals experiencing a mental or behavioral health crisis.” 911 call centers perform an essential role in providing these services, which are often underappreciated. Compliance will require the City to implement the policies, protocols, training and capability for data collection and analysis necessary for its Emergency Communications Center to perform services in a manner that fulfills the requirements of the Agreement. As a step to that end, the MECC, in collaboration with MN-CIT, produced for informal review the Crisis Intervention Training for 911 call-takers and dispatchers. We provided feedback which required additional work to align the training with best practices for 911 call-takers and dispatchers. We participated in a workshop session to further discuss the feedback with the Parties and the training vendor. MECC anticipates that the training material will be completed in the next reporting period. While the Agreement specifically designated dispatchers and their supervisors to receive training under ¶237, MECC reports that it is also planning to provide this training to 911 call-takers and dispatchers.

Monitoring and Enforcing MPD Work Hour Limits Under Agreement Requirements

Paragraph 290 of the Agreement requires MPD to establish daily and weekly work hour limits. During the Review Period, we met with MPD leadership to provide an overview of our baseline review of historical work hour data from January 1, 2022 – December 31, 2024. The baseline review revealed that members frequently exceed the requirements of ¶290, which are stricter than current MPD policy directives on work hour limits. Until policy is updated on this topic, accountability for exceeding Agreement provisions will remain limited. We recognize that MPD continues to operate well under its sworn capacity, especially in patrol districts, which create legitimate challenges to operationalizing the requirements of ¶290; however, steps can and should be taken to address MPD members who are routinely exceeding these requirements with no justification. MPD should also consider updating policies and data systems to improve analysis and managerial controls over hours worked.

The City’s IT Department has been gathering requirements for new scheduling management software for MPD, which is expected to provide additional data reporting capabilities and to provide administrative alerts for members that are approaching or have exceeded policy limits on hours worked (to include off-duty work hours recorded in the system). The City and MPD are working on a comprehensive list of requirements identified by MPD needed for the updated system and will finalize these items with the selected vendor.

Accountability and Oversight (Part 10)

During this Review Period, we observed training, Office of Police Conduct Review (OPCR) and Internal Affairs Division (IAD) Intake and review panels. Additionally, we conducted audits to ascertain baselines and to assess progress in future audits when new policies and investigation manuals have been in effect. The IA and OPCR Investigation Manuals have been approved by us during this reporting period. OPCR has made notable progress in increasing capacity through new staffing, leadership, and training despite the challenges reported during the first and second review periods. These improvements, particularly under the leadership of former Civil Rights Director Phillips and current OPCR Director Fujisawa, have increased efficiency and allowed OPCR to reduce its historical case backlog. OPCR has also been found to be in partial compliance with Paragraph 339 in its support to the Community Commission on Police Oversight during this reporting period and has provided further documentation and resubmitted for a compliance assessment in the next reporting period.

MPD's IA Division continues to experience operational inefficiencies, insufficient staffing, and a lack of trained personnel in key roles, resulting in persistent bottlenecks. The accountability system's goal is to change behavior through timely corrective action, to set a uniform standard for performance, and to engender trust through prompt accountability. Achieving this goal requires personnel to be held accountable close in time to when policy violations occurred. The bottlenecks undermine these important goals and hinder IA's ability to clear its historical case backlog.

New Manuals & Policies

OPCR and IA conducted extensive editing to complete each unit's Misconduct Investigation Manual, in collaboration with us and MDHR. Developing these manuals was a noteworthy achievement, requiring a significant amount of work by personnel in IA, OPCR and the CAO's office. We approved both manuals.

During the Review Period, MPD edited the related misconduct and accountability policies (Chapter 2-100) to begin aligning them with the Agreement and the now-approved manuals. For almost the entire reporting period, these policies were under revision by MPD while the IA and OPCR Investigation Manuals were being completed. MPD returned updated versions of these policies to us and MDHR in mid-September.

OPCR and IA Training & Staffing

The Civil Rights Department of Minneapolis has advertised, interviewed, and made a conditional offer for a Compliance and Quality Assurance Manager position, waiting only on approval of background checks. This role is designed to help the Civil Rights Department internally monitor and manage its compliance with the requirements of the Settlement Agreement and other internal processes and reporting. In addition to supporting OPCR on explicit compliance metrics, this position will also support the three other Divisions within Civil Rights.

Several OPCR and IA staff also attended training sessions hosted by the National Association of Civilian Oversight of Law Enforcement (NACOLE) to learn more about nationally accepted best practice standards for investigative work, effective case review, efficiency, and making factual and consistent discipline recommendations.

Over the past year, the Internal Affairs Division has experienced significant personnel changes. This reporting period has seen such significant turnover that very few seasoned IA staff remain available to train incoming staff. The rapid personnel turnover is contributing to department-wide inefficiencies and causing stress within the unit. IA work requires highly specialized training and knowledge. Sudden changes in personnel assignments can be particularly disruptive, and some of the resulting inefficiencies could have been avoided by a staggered and planned transition for outgoing staff. MPD personnel are allowed after a two-year period to request a transfer that is usually granted regardless of the impact on the unit's ability to provide a robust and well-functioning accountability system.

In a short time, the unit received a new Bureau Chief, hired in April 2025, along with the assignment of a new Commander and three new sergeants. In addition, the MPD has identified an additional support staff member who will begin work in the Fall. All these personnel changes occurred without a sufficient succession plan that would involve time for the new personnel to be sufficiently trained.

Additionally, key personnel are performing multiple roles to support ongoing operations. For example, the IA Case Manager Supervisor, in addition to regular duties, also spends a significant amount of time training and preparing new employees for their assignments, reviewing edits and incorporating feedback on IA policies and manuals, and playing a lead role in providing requirements for the new misconduct case management system.

We have seen the impact these changes have had on IA's managerial, supervisory, and investigative personnel, and the work associated with completing backlog cases. We recognize the dedication and determined efforts made by IA personnel during this challenging period in MPD's transition to fulfilling the requirements of Part 10 of the Agreement.

MPD reported that training new IA personnel is ongoing. Of the three new sergeants assigned, all have completed training on intake procedures, and one has completed training on expedited dispositions.

MPD and OPCR have issued an RFP for developing lesson plans and providing misconduct investigation training. The lack of training of new personnel will continue to hinder the efficiency of IA operations and the overall effectiveness of personnel assigned to IA functions.

Observations of the IA and OPCR Intake Process

During the Review Period, we observed twelve IA Intake meetings. These meetings are attended by IA supervisors, investigators with cases for review, and an attorney assigned by the City Attorney's Office. We have been impressed with the in-depth discussions and level of examination each case receives. The City Attorney's Office does a thorough job

overseeing these reviews and helps lead the IA team to address and include all applicable potential allegations.

During the Review Period, we attended and observed eight OPCR Intake meetings. These meetings were attended by OPCR supervisors, investigators with cases for review, and an attorney assigned by the City Attorney's Office. OPCR cases can often be more time consuming to investigate. This is because OPCR complaints originate from the public, who are often less knowledgeable about MPD policies than MPD personnel, who are often able to specifically identify the policy violation and the relevant factual allegations, which can streamline the intake process. Like our observations of the IA Intake Process, we have been impressed with the in-depth discussions and level of examination each OPCR case receives.

We observed that OPCR investigators are new to their roles and many request and receive assistance from the assigned City Attorney, who provides effective guidance on legal, policy, and administrative questions.

The intake review process appears to be thorough, with allegations consistently being included on charging documents, and specific care is taken when closing a complaint with a status of "No Basis." We will conduct more extensive quality assurance audits of the intake process to determine compliance with the Agreement.

It is our view that IA and OPCR intake reviews were professional, and cases we observed were methodically evaluated. We will continue to periodically monitor intake sessions in the future and will be notified whenever there are cases with serious allegations scheduled for review.

Review Panel Process

Review Panels are designed to evaluate completed investigations and issue recommendations. They consist of both civilian and sworn panelists; with civilian members from the Community Commission on Police Oversight (CCPO) and Civil Rights Commission (through the end of 2025). The panel determines whether the officer(s) violated MPD policy and recommends non-disciplinary corrective action or discipline, if applicable. (The panel may recommend either or neither if there was no policy violation) Additionally, the panel may remand if there is a factual gap or further information is needed to make a decision.

The Agreement requires OPCR and the City to provide robust support to Review Panels. OPCR personnel oversee the Review Panel process. IE Team members have observed nine Review Panels during this reporting period. All panels are held virtually, and all panels begin with an instructional video provided by OPCR. Panelists then select a Chair for each review who is responsible for reporting the results of the Panel within three business days to City staff. All the panels we reviewed consisted of five members – three civilian CCPO voting members and two MPD sworn voting members. During the review period, the total panel membership was reduced from five to three members which allows for a more effective allocation of both sworn and CCPO Commissioners, and an increase in the throughput of reviews.

As of the end of September, 71 panels have taken place in 2025. When compared to 2024, 24 review panels were conducted by both sworn and CCPO Commissioners and the panel is on track to quadrupling its rate of review in 2025.

In all the Panels we attended, we observed reasonable and thorough discussion. We observed an equitable mix of sworn and civilian members volunteering as the Panel Chair. In all cases, we observed that the panel concluded with recommendations within the disciplinary matrix's applicable range. We have not observed any deviations from the panel guidelines. On several of the cases we observed, the Panel requested a City Attorney to temporarily join the meeting to answer a question. A City Attorney was readily available in each instance and joined only briefly to answer substantive questions.

We observed a few panels which had to be continued due to an insufficient number of available members. We also observed, in some instances, panel members acknowledged they had not fully reviewed the materials, due to matters beyond their control, and were unable to fully participate. These panels were appropriately rescheduled. City staff make every effort to reschedule the same panel members when this occurs, because some of the members have already spent considerable time preparing for the case review. The amount of time CCPO members and sworn panelists dedicated to meetings, researching policies, and preparing for review panels is extensive, and they are to be commended for their efforts. Overall, the panels operated efficiently, and City staff appear to be able to provide suitable and substantial support for their work. We will need to determine through future surveys and observations whether there is sufficient staff support for CCPO's work.

Backlog Reduction

Making progress on the large case backlog is an important priority. The backlog poses logistical challenges to meeting the requirements of the Agreement by tying up resources and increasing the length of case processing times. IA and OPCR provided information on case backlog counts and the status of cases under investigation.

The *historical* backlog refers to a fixed group of older cases, with a specified cutoff date. The definitions for historical backlog for IA and OPCR differ:

- For IA, the historical backlog is defined as any open case that was at least 180 days (which is the amount of time given for an investigation from the time the complaint is received) old as of March 17, 2024.⁹
- For OPCR, the historical backlog is defined as any open case where the complaint was received by OPCR on or before May 23, 2024.

While we have accessed the IA and OPCR case management systems, we are unable to validate whether all cases based on these definitions were included in the counts provided by IA and OPCR. Data extracts from the systems did not align with the totals provided in previous reporting periods and further analysis will be required by us to determine if, in fact, all open cases that fit these definitions have been properly identified by IA and OPCR.

⁹ 180 days is the period allowed for investigation from the date the complaint is received.

By the end of the last reporting period, both IA and OPCR reported they had processed all historically backlogged cases through intake, either assigning an investigator or referring a case to its proper agency or non-disciplinary corrective action. Both IA and OPCR had planned to eliminate the historical case backlog by the end of this reporting period, and while neither met that goal, OPCR has built capacity while IA is struggling to assign resources at key bottlenecks.

We have attempted to validate this information against the data systems used by IA and OPCR to manage misconduct cases but are unable to independently verify the data based on data extract reports. However, OPCR conducted a manual review of all data and based on that review, has demonstrated the ability to produce much higher quality data reports. It has been able to track the status of cases within its review process at each stage, identify where bottlenecks were occurring, and report publicly to the CCPO monthly the progress on the backlog.

To confirm the status of all cases, we will need to review each individual case to determine whether the reported data is accurate in the system. These status reporting issues have been identified as system requirements for the new case management system that is being developed for IA and OPCR.

OPCR reports reducing its case backlog during the Review Period, with 27 more cases having been completed since the prior Review Period. Most remaining cases are in later stages, nearing completion: awaiting supervisory review, panel review, or the chief's decision. The investigative work for all but 4 historical backlog cases out of 23 was completed during the review period.

IA's backlog, by contrast, shows limited progress. MPD reports only seven additional cases have been completed since the last reporting period. 64 cases await supervisory review, delayed by only one trained staff member available for review. A contributing factor is that IA has to coordinate the disciplinary decision-making recommendation, and memoranda of the Chief for review with the City Attorney's Office, and then the Chief. IA has engaged with relevant stakeholders in the memo writing process and proposed solutions to eliminate inefficiencies in the process. During the next reporting period, we will observe whether these or other process improvements expedite the process. Resolving this issue will be key to IA's ability to get back on track in reducing its case backlog and achieving compliance with the goals outlined in the Evaluation Plan.

Community Commission on Police Oversight

During the Review Period, OPCR submitted a plan in response to Paragraph 339's requirement that OPCR provide sufficient staff support to the operations of the CCPO. OPCR has begun to implement the plan, and we have assessed it as Partially Compliant, On-Track. The plan includes information on OPCR's organizational structure, staffing, surveying, and analysis, and how OPCR will provide meaningful support to CCPO.

We have observed several CCPO meetings, review panels, and trainings during this reporting period which will inform a future assessment for compliance related to the CCPO (paragraphs 337 and 339).

In September 2025, we observed CCPO Panelist Training, led by the City Attorney's Office with support from a NACOLE representative. The three-and-half-hour training demonstrated that the City is maintaining a structured and robust process to ensure that panelists are adequately prepared for their responsibilities.

OCPR provided extensive staff support for the CCPO training, including orientation materials, scheduling guidance, access to on-call attorneys and investigators, and procedural resources such as the discipline matrix. The training concluded with opportunities for panelists to ask questions and share their experiences, underscoring the City's continued improvement in the areas of transparency, accountability, and inclusive engagement in the oversight process.

Data Systems, Analysis, and Transparency (Part 11)

Anticipated Improvements Outlined in Data Systems Plan

Over the next few years, the IT Department and the MPD will be responsible for managing the implementation of the following initiatives (all of which are in the Data Systems Plan):

- Establishment of Data Governance Structures
- New Case Management System for IAD and OPCR
- New Early Intervention System
- New Use of Force Quality Assurance Review Module
- New Supervisor Use of Force Review Modules
- New Officer Shift Scheduling System
- New Policy Management System
- Updates to Field Based Reporting / Records Management System
- Upgrades to Data Architecture and System Data Connectivity
- Upgrades for Public Facing Data Dashboards

We will closely monitor the implementation of these initiatives to ensure that the necessary systems and requirements are incorporated into the initial development phase so that the MPD and the IT Department can avoid unnecessary delays.

Updates to Data Dashboards

The City reported that it is continuing its efforts to improve enterprise-wide data architecture and system data connectivity. These improvements are needed to ensure that data dashboards are accurate, accessible, and sustainable over time. As new data systems are brought online and connected, we will review dashboards as they are developed to determine compliance with the Agreement's requirements outlined in Part 11.

The City announced it has issued an RFP for consulting services to assist MPD with data analysis and dashboard development. The City plans to choose a vendor in the next review period.

Quarterly Review Panel Policy Development and Meetings

The Parties convened a workshop session with us to discuss final revisions to the draft Quarterly Review Panel (QRP) policy. MPD anticipates submitting the QRP policy for a compliance determination during the next review period.

MPD conducted two QRP meetings during the Review Period, on Level 1 and Level 2 uses of force. We observed that the Department was more critical of itself when observing officers' decisions to use force. In comparison to the QRP session observed in prior review periods, during this Review Period, there was also more awareness and acknowledgement of officers that may be unnecessarily escalating the situation that led them to later have to use force to gain control and/or make an arrest. As noted in our previous progress report, MPD does not yet have the data systems available to provide the robust analysis required. We believe the QRP sessions will continue to improve once the systems better exist to provide the data analysis required to review from a broader systems perspective.

Case Management System for Misconduct Investigations

Part 11 requires MPD and the City to develop a new case management system for OPCR and IA misconduct investigations. They selected the same vendor it chose to implement the EIS, a requirement of Part 8 of the Agreement, and the performance evaluation system, a requirement of Part 3. Each of these systems is critical to the success of MPD's compliance efforts and will require significant development of resources from both the City/MPD and the vendor to be successful.

The original schedule envisioned the case management system for OPCR and IA beginning a pilot deployment phase in February. This was later shifted to June 2025. Unfortunately, additional delays in the case management system's deployment schedule have pushed the pilot's deployment date to the end of March 2026.

Based on our observations, there are three reasons for these delays:

- The previous IA leadership did not prioritize implementation in the project's initial stages, given the stated preference for an alternative vendor.
- MPD under-resourced the internal project management effort for EIS and the case management system (and two other system deployments) when the project's significance required dedicated resources.
- The vendor experienced staff attrition and did not effectively communicate or provide timely follow up on OPCR/IA requests for proposed system configurations to meet their needs.

Beginning in March, representatives from both IA and OPCR spent considerable time with the vendor's project team on providing the requirements necessary to achieve not only compliance with the Agreement's requirements, but also a more user-friendly interface and

management system for misconduct investigators and administrative staff. The vendor experienced considerable delays in providing responses to requests from IA and OPCR to customize the system to meet their requirements. The unfortunate result of these delays also led to the vendor's lack of focus on the EIS project and other technology modules planned for development and deployment during the Review Period.

In response to these issues, City IT leadership and MPD leadership intervened with the vendor's management to provide redirection and refocus on these issues. The result has been that the vendor has added additional qualified staff to manage the project implementation efforts more effectively. We will continue to participate in status meetings with MPD and City IT to obtain information on any further obstacles to deploying the new system.

2. Description of Work Conducted by the IE Team During the Review Period

Policy Review and Approval

This list includes the status of each policy or group of policies worked on during the Review Period, which ended September 30, 2025.

Policies & SOPs Approved During the Review Period:

- **7-350, Emergency Medical Response.** Most of the review work on this policy was conducted during the last reporting period, but we did one final review in April, and the policy was approved during this reporting period.
- **5-104, Non-Discriminatory Policing and 5-109, Procedural Justice and Professional Policing.** We continued to work with the parties on the development of these policies and approved them in August.
- **3-501, Member Health and Wellness and 3-502, Member Medical Information, Injury, and Incident Response.** After multiple workshops, we approved these policies during this reporting period.
- **Police Misconduct Investigation Manuals.** MPD Internal Affairs & Office of Police Conduct Review: After several rounds of feedback with MPD and the City, and thorough review, we approved these manuals in September 2025.
- **4-223, Body Worn Cameras and In-Car Cameras and 4-508, BWC and ICC Data Management.** These policies were near final for some time, but a few remaining questions arose that required MPD internal discussions and exchanges between MPD, MDHR and us. After several discussions and exchanges of drafts, we approved these policies in September.

Policies and SOPs Under Development:

- **Field Training Officer Program SOP.** We provided extensive technical assistance to the MPD on this SOP during the reporting period. This technical assistance included attending five working sessions with the MPD to review the SOP details. We did not receive an updated version of this SOP between its mid-August technical assistance session with MPD and the end of this reporting period. Multiple workshops were rescheduled due to delays in returning an updated version of the SOP.
- **2-500s, Training policies.** We conducted a review of these policies during the reporting period and participated in a workshop session in July. As far as we are aware, MPD is awaiting agreement on the FTO Program SOP prior to updating the drafts of these policies.
- **2-100s, MPD Misconduct and Accountability policies.** The policies are in workshoping, as of the end of the reporting period.

- **3-503, Peer Support.** We provided technical assistance to MPD on this policy, and MDHR conducted an additional review of the policy. As of the end of the reporting period, the policy is under revision by MPD.
- **9-300s, Warrants.** In August 2025, MPD submitted part of an updated policy to us for review. We sent feedback to MPD in early September 2025, and as of the end of this reporting period, it remains under revision by MPD.
- **Disciplinary Matrix.** We provided informal feedback to MPD on the Matrix in April. We understand that the draft has undergone significant revisions since we last reviewed it. As of the end of this Review Period, we have not received an updated draft for review.
- **Critical Incident Communications Plan:** We conducted a preliminary review of an early version of this plan which was drafted by the City. Since then, the City has stated that it is overhauling this document. We await its resubmission.
- **2-601, Quarterly Review Panel.** We provided informal feedback early during this reporting period on this policy. We also participated in two workshops regarding this policy.
- **9-100s& 9-200, Stops, Searches, Arrests & Citations** These policy chapters include several policies, covering a wide range of topics from voluntary contacts, investigative stops, vehicle stops, searches, citations, arrests, transportation of persons in custody, supervisory reviews of SSCAs and more. During this reporting period, there has been extensive review, editing, and discussion of the policies within these two chapters.
- **2-203, Early Intervention System.** This policy covers the detailed procedures of how members and supervisors can expect to use and interface with the EIS system. During this reporting period, we conducted two workshop calls with the Parties and reviewed several versions of this policy. A few outstanding issues remain open for resolution as of the end of this reporting period.

In addition to the extensive policy review and collaboration work discussed above, we continued to participate in biweekly meetings with the MPD Policy Team to maintain open communication regarding the status of MPD’s policy work under the Agreement process. We remained engaged with MPD by providing feedback and technical assistance, which occurred both through the initial policy review process and through other communications to discuss specific policy issues that arose and required discussion.

Community Outreach Efforts

Public Information Sessions

We convened a public meeting in July at Lucy Craft Laney Elementary School. MPD’s Community Engagement team supported our efforts including in-person neighborhood outreach and introductions to community organizations. During the public meeting we provided updates on implementation progress and how we approach institutional change management. The meeting also allowed interested members of the community to ask us

questions. These meetings have seen high attendance and robust engagement from members of the community, local organizations, and City Council members. The meeting, including questions, was recorded and is accessible here.

Noting the public interest in key Settlement Agreement updates, and in keeping with Agreement's spirit for us to be transparent and accessible, we also presented our previous report findings to the Minneapolis City Council during this reporting period and answered the councilmembers' questions. This was recorded and is accessible here.

In addition to the public sessions required by the Agreement, we facilitated meetings with several community groups and observed neighborhood and community space visits led by MPD's Community Engagement team.

Vendor Selected to Conduct Community and Police Surveys

Per part 12 of the Agreement, and with the approval of the Parties, we have selected a vendor to conduct the community and policy surveys required under the Agreement. Per the Agreement, once the surveys are conducted and analyzed, the information will be shared with the Parties and then published on our website.

Community Map

We also continue to build a [Community Map](#) which identifies organizations involved in policing, their mission, and their connections to other Minneapolis organizations. We encourage organizations to submit information via our [Community Map Questionnaire](#) for incorporation into the map.

Engagement with MPD Personnel and City Staff

We continue to meet regularly with City Department personnel involved in implementing the requirements of the Agreement. This includes members of the City Attorney's Office, Department of Civil Rights, IT Department, Property Services, and Emergency Communications.

We note that there is improved technology in each of the precinct roll call rooms. Sergeants conducting roll calls have begun using new monitors connected to their computers to display roll call directives from commanders and department leadership. Information relevant to daily patrol, officer awareness, policy updates, and training updates were not just read to the officers, but shown to them on the monitors, which constitutes a marked improvement in how information is disseminated to officers. Even with these improvements, however, officers continued to criticize the flow of communication within the police department. The common frustration expressed by officers across the agency is that they remain unaware of how and why decisions are made.

We heard complaints from a number of officers about the SA's new requirements, including complaints that requirements and restrictions are being imposed on MPD officers that are not imposed on neighboring departments. These views are not universal, however. Some veteran officers cited positive improvements to training and working conditions and expressed the belief that the department was trying to go in the right direction. The new

officers we have observed in field training demonstrated positive attitudes and expressed enthusiasm about being MPD members. We also observed and spoke with recent “lateral” hires (officers who left another agency to join MPD), who were also enthusiastic about joining MPD. We are optimistic that as officers learn more about the Agreement’s requirements and goals and how they will improve their working conditions, attitudes toward the Agreement will improve.

Audits and Compliance-Related Reviews

Audit of Cases in Misconduct Investigations Backlog that Resulted in Coaching

During this reporting period, we audited all misconduct cases that resulted in coaching in the historical IA and OPCR backlog of cases, to determine whether these cases were appropriately assigned. The issue relates to the Agreement’s requirements that investigations be timely, thorough, effective, and efficiently managed through a centralized case system, while also ensuring that outcomes are fair, consistent, and provides due process. This audit also helped us to ascertain a baseline which will inform future progress reports and compliance assessments. While the audit was completed within this Review Period, the ensuing report will be published within the next review period.

3. Expected Progress for Next Reporting Period

This section provides a brief overview of major work items expected to occur during the next review period (October 1, 2025, through March 31, 2026).

Agreement Part	Major Work Item During Next Review Period
Part 2 (Policy)	City to submit the following policies for review and approval: <ul style="list-style-type: none"> • Quarterly Review Panel • Stops, Searches, Arrests and Citations (9-100s & 9-200s) • Early Intervention System • Misconduct and Accountability Policies (2-100s) • Training policies (2-500s) • Field Training Officer Program SOP • Peer Support
Part 3 (NDP)	<ul style="list-style-type: none"> • Development of SSCA, Non-Discriminatory, Disorderly Conduct, and Obstruction of a Legal Process training curriculum
Part 4 (Use of Force)	<ul style="list-style-type: none"> • Completion of all three days of UOF training • Conduct Firearms Pointing Audit
Part 5 (SSCA)	<ul style="list-style-type: none"> • Receive IE approval of SSCA policies (9-100s & 9-200s) • Development of SSCA, Non-Discriminatory, Disorderly Conduct, and Obstruction of a Legal Process training curriculum
Part 6 (BWC)	<ul style="list-style-type: none"> • Receive IE Approval of Audit SOPs • Compliance Review of Ticketing System for ICC issues
Part 7 (Training)	Receive IE approval of the following training materials: <ul style="list-style-type: none"> • Supervisor Force Review • Supervisor Leadership
Part 8 (Wellness)	<ul style="list-style-type: none"> • Peer Support policy completed (see Part 2) • EIS policy completed (see Part 2) • Develop SOPs for metrics and system management related to EIS Alerts • Continued implementation of the Facilities, Equipment and Non-Database Technology Plan • Onboard the peer support team leader • Increase Wellness Unit staffing • Relocate the Wellness Unit • Deliver Officer Health and Wellness and EIS training at annual in-service • Launch the Wellness App, a phone-based app that provides mental health resources, including contact information for peer support members, clinical service providers, and wellness exercises. • Submit schedule for the facilities, equipment and non-database technology reassessment and complete the first facilities reassessment (which was due in 2024)
Part 9 (Mental and Behavioral Health)	<ul style="list-style-type: none"> • MPD and the City will assess the operational functioning of the BCR to assess whether it is <i>adequately resourced</i> as required under ¶289.

	<ul style="list-style-type: none"> • Deliver CIT for 911 call-takers and dispatchers (4 hours); new recruits (40 hours), and annual in-service refresher for all MPD sworn members. • Update policy supporting ¶290 requirements related to number of hours worked by MPD members • Assign a full-time MPD CIT Coordinator. • Revise Crisis Intervention policy to include the roles and responsibilities of the MPD CIT Coordinator.
Part 10 (Accountability)	<ul style="list-style-type: none"> • Receive IE approval of MPD Misconduct and Accountability policies (2-100s) • Continued progress toward eliminating historical backlogs in misconduct cases • Develop training for misconduct investigators
Part 11 (Data)	<ul style="list-style-type: none"> • Continued progress on the implementation of the Data Plan • Complete and implement the Quarterly Review Panel policy • Complete and implement the Force Review Board policy

4. Status of Compliance with Settlement Agreement Requirements

The City and MPD are still in the foundational phase of the reform process. As a result, our process for compliance assessment is still ongoing. At this point, there has been no analysis under paragraph 440 and 441 to determine “Full and Effective Compliance” as defined by the Agreement. Once a full Part in the consent decree (i.e. Part 4: Use of Force) is complete and the terms of that section implemented, we will conduct a formalized qualitative and quantitative assessment to determine the extent to which the work by the City and MPD results in improved performance by officers.

The paragraphs determined to be partially compliant are outlined below (listed by Part and Paragraph number):

Paragraphs rated as Compliant during the Review Period:

Part 10 (Accountability):

- **Paragraph 302** requires MPD to revise its policies and procedures for establishing police misconduct investigative timelines, benchmarks, and goals by which progress will be measured. We have reviewed the IA and OPCR Investigation Manuals submitted on September 19, 2025, and have determined that they are compliant with this requirement.

Paragraphs rated as Partially Compliant – On Track during the Review Period:

Part 2 (Policy):

- **Paragraph 27** requires MPD to engage in officer, supervisor, and community engagement to gather feedback to incorporate and inform policy changes on the 4-core policy topics (MVVG, NDP, UOF, SSCA). **Paragraph 28** states that for the 4-core policy areas, draft revisions must be posted online for 45 days (about 1 and a half months). During previous review periods, MPD posted drafts of the various MVVG, NDP, UOF, and SSCA related policies. As part of review and approval process for the 4-core policies, we evaluated whether MPD considered feedback received under paragraphs 27 and 28 in its policy edits. Once all revisions have been completed for the SSCA policies, we will reassess this requirement to determine whether the paragraphs are fully “Compliant.”

Part 3 (Non-Discriminatory Policing):

- **Paragraphs 37, 38a-d, 38f, 39, 41.** With our approval of policy 5-104 “Non-Discriminatory Policing” and 5-109, “Procedural Justice and Professional Policing” we now consider the paragraphs listed above as Partially Compliant, On Track, given that each outlines a topic that is included in the approved policies. Development and delivery of training on these policies are anticipated in the future. MPD members must be trained and assessed for accountability to the policy before these paragraphs can be considered Compliant.

Part 6 (Body Worn Camera):

- **Paragraphs 172, 173, 174a-h, 175, 176a-b, 177, 178.** upon our approval of policy 4-223, “Body Worn Cameras and In-Car Cameras”, and 4-508, “BWC and ICC Data Management” updated BWC and ICC policies, we now consider the paragraphs listed above as Partially Compliant, On Track, given that each outlines a topic that is included in the approved policies. Development and delivery of training on these policies are anticipated in the future. MPD members and OPCR staff must be trained and assessed for accountability to the policy before these paragraphs can be considered Compliant.

Part 8 (Officer Wellness and Support):

- **Paragraphs 253, 257, 258, 259, 260, 261, 262, 263, 264, 267.** Upon our approval of policies 3-501, “Member Health and Wellness,” and 3-502, “Member Medical Information, Injury, and Incident Response” we now consider the paragraphs listed above as Partially Compliant, On Track, given that each outlines a topic that is included in the approved policies. Development and delivery of training on these policies are anticipated in the future. MPD members must be trained and assessed for accountability to the policy before these paragraphs can be considered Compliant.

Part 10 (Accountability):

- **Paragraphs 304, 307a-b, 308, 308a-b, 309, 310, 311, 312, 313, 314, 315, 316, 317, 317a-e, 318, 319, 320, 321, 322, 322a-i, 323, 324, 324a-e, 325, 326, 327, 328, 329, 330, 330a-e, 331, 332, 333, 334, 335, 336, 340, 342, 343, 345a-c, 346, 351, 353, 354.** Upon our approval of the IA and OPCR Investigation Manuals, we now consider the paragraphs listed above as Partially Compliant, On Track, given that each outlines a topic that is included in the approved manuals. Development and delivery of training on these policies are anticipated in the future. MPD members must be trained and assessed for accountability to the manuals before these paragraphs can be considered Compliant.

All other paragraphs not outlined above or otherwise referenced in prior semi-annual reports are considered “Not yet measured.”

5. Technical Assistance Provided by the IE Team During Review Period

The nature of the collaborative work between the Parties and us often blurs the line between evaluation and technical assistance. For example, as reported above, we have provided extensive advice and guidance during the policy drafting process that is not specifically provided for in the Agreement. Nevertheless, the following list identifies assistance that we consider technical assistance provided during the review period:

- The City and MPD requested that we provide guidance and subject matter expertise to support implementation of the Early Intervention System.
- We have also been able to provide more general technical assistance to the MPD Policy Team to help advance the work as efficiently as possible, which we hope will continue to improve MPD's policy development procedures.
- We provided direct assistance in the drafting of the SOP for Field Training Officers.

Conclusion

This third Progress Review shows incremental but meaningful progress by the City and MPD implementing the Agreement's requirements. The foundations for reform—revised policies, a training plan and course materials, upgraded facilities, improved data, and early systems development—are well underway, reflecting the City's and MPD's significant investment of time and effort.

Continued progress, however, will depend on the ability of both the City and MPD to maintain focus, improve internal and external coordination and communication, and provide the financial support necessary for full implementation. Transparency with both officers and the community will be essential to building confidence in the process and regaining trust in the department. MPD leadership should lead the process by advocating for implementation for the good of the department and the Minneapolis community. Steady progress, unflagging commitment, and accountability through transparency are the keys to achieving lasting, operationalized change that fulfills both the letter and the spirit of the Agreement.

Appendix

Requirement for Semi Annual Progress Reviews

In compliance with paragraphs 413 and 414 of the Settlement Agreement and Order (“Agreement”) dated July 13, 2023, in the matter captioned *State of Minnesota by Rebecca Lucero, Commissioner of the Minnesota Department of Human Rights, plaintiff vs. City of Minneapolis*, Court File No. 27-cv-23-4177 (Judge Karen Janisch), the Independent Evaluator (“IE” or the “IE Team”) submits this 3rd Progress Review, for the period April 1, 2025 through September 30, 2025.

The Agreement, paragraphs 413 and 414, specifies the requirements for the Progress Report.

B. Independent Evaluator Progress Reviews

413. The contract with the Independent Evaluator will provide that the Independent Evaluator will post to the Independent Evaluator’s website semi-annual written reports (“Progress Reviews”) covering the reporting period that will include:

- a. The progress made by the City and MPD under the Evaluation Plan, as well as an overall evaluation of the City’s and MPD’s progress to date in complying with the Agreement;*
- b. A description of the work conducted by the Independent Evaluator during the reporting period, including a summary of the annual community evaluation;*
- c. The methodology and specific findings for each review conducted, redacted as necessary for privacy concerns and legal compliance;*
- d. A projection of the work to be completed during the upcoming reporting period and any anticipated challenges or concerns related to implementation of the Agreement;*
- e. The extent to which the requirements of this Agreement have been: (i) incorporated into implemented policy; (ii) trained at the levels set forth in this Agreement for all relevant MPD officers; (iii) reviewed or audited by the Independent Evaluator in determining whether MPD has reached Full and Effective Compliance, as defined in Paragraph 440, including the date of the review or audit and the data and materials relied upon for the review or audit; and (iv) found by the Independent Evaluator to have reached Full and Effective Compliance, and the date of this finding;*
- f. The Independent Evaluator’s recommendations regarding necessary steps to achieve Full and Effective Compliance, as defined in Paragraph 440; and*
- g. The extent to which the Independent Evaluator has provided technical assistance.*

414. The contract with the Independent Evaluator will provide that the Independent Evaluator will provide a copy of the semi-annual reports to the Parties in draft form at least 30 calendar days prior to public release of the reports to allow the Parties to comment on the reports. The Independent Evaluator will also post the final reports, along with comments from the Parties that the Parties request be posted, and the Independent Evaluator’s response, if any, to its website. The Independent Evaluator will also establish an electronic mechanism for receiving public feedback on the reports.

Links to Prior Progress Reviews

Our prior Progress Reviews can be found on our website at the following links:

- [March 18, 2024 – September 30, 2024](#)
- [October 1, 2024 – March 31, 2025](#)

To provide comments or feedback about this Progress Review and other Progress Reviews, or to learn more about the Settlement Agreement and the work performed by Effective Law Enforcement for All (ELEFA), which serves as the Independent Evaluator, visit our website at: <http://elefamn.org>

Defined Terms for Statuses of Evaluation Plan Goals

We use the following categories to describe the state of progress for **management goals** (as of the end of the Review Period):

- **Completed:** MPD/the City has demonstrated to us that the stated management goal has been sufficiently completed and based on our assessment of progress has determined the goal was completed.
- **In-Progress:** MPD/the City are actively working on the stated management goal but have not yet been able to demonstrate to us that the goal has been satisfactorily completed, either because it is not yet ready for assessment or they are actively working to incorporate feedback from us or MDHR.
- **On Track:** MPD/the City have not yet begun to actively coordinate with us to provide status on the goal; however, based on the overall timeline of the goal and our observations regarding capacity for MPD/the City to achieve the goal, they remain on track to completing the goal before the target date.
- **Off Track:** MPD/the City have begun work on a goal but are not expected to complete the item before the target date based on the overall timeline and observations regarding capacity.
- **At Risk:** MPD/the City have not yet begun to actively coordinate with us to provide status on the goal; however, based on the overall timeline of the goal and/or our observations regarding capacity for MPD/the City to achieve the goal, they are not expected to complete the goal before the target date.
- **Postponed:** A mutually agreed upon revision of the expected target date which can allow for the reprioritization of the stated management goal to be achieved later.

We use the following categories to describe the state of progress for **policy revision** goals (as of the end of the Review Period):

- **IE Approved:** MPD/the City has demonstrated to us that the policy (or policies) under revision has been sufficiently completed to adhere to the stated policy requirements of the Settlement Agreement.
- **Near IE Approval:** MPD/the City have completed the workshopping phase for the stated policy (or policies) and have submitted them for final feedback from MDHR and approval by IE Team.
- **In-Progress:** MPD/the City have submitted the stated policy (or policies) for initial review and/or are still in the workshopping phase.
- **On Track:** MPD/the City have not yet begun to actively coordinate with us to provide status on the goal; however, based on the overall timeline of the goal and our observations regarding capacity for MPD/the City to achieve the goal, they remain on track to completing the goal before the target date.
- **Off Track:** MPD/the City have begun work on a goal but are not expected to complete the item before the target date based on the overall timeline and observations about capacity.
- **At Risk:** MPD/the City have not yet begun to actively coordinate with us to provide status on the goal; however, based on the overall timeline of the goal and/or our observations regarding capacity for MPD/the City to achieve the goal, they are not expected to complete the goal before the target date.
- **Postponed:** A mutually agreed upon revision of the expected target date which can allow for the reprioritization of the revision of the policy to be achieved later.
- **Not Yet Started:** MPD/the City have not yet begun to actively coordinate with us to submit the stated policy (or policies) for initial review.

We use the following categories to describe the state of progress for **training development and delivery** goals (as of the end of the Review Period):

- **IE Approved:** MPD/City have developed and delivered the stated training goal, which has been observed by us, and we have determined such training meets the requirements of the Settlement Agreement.
- **Completed but does not meet the Agreement requirement:** MPD/City have developed and delivered the stated training goal, which has been observed by us, and we have determined such training does not meet the requirements of the Settlement Agreement.
- **In Progress:** MPD/City have submitted training curriculum or related material, which is under review by ELEFA and/or MDHR, as necessary.
- **On Track:** MPD/the City have not yet begun to actively coordinate with us to provide status on the goal; however, based on the overall timeline of the goal and our observations regarding capacity for MPD/the City to achieve the goal, they remain on track to completing the goal before the target date.
- **Off Track:** MPD/the City have begun work on a goal but are not expected to complete the item before the target date based on the overall timeline and observations regarding capacity.

- **At Risk:** MPD/the City have not yet begun to actively coordinate with us to provide status on the goal; however, based on the overall timeline of the goal and our observations regarding capacity for MPD/the City to achieve the goal, they are not expected to complete the goal before the target date.
- **Postponed:** A mutually agreed upon revision of the expected target date which can allow for the reprioritization of the stated training goal to be achieved later.
- **Not Yet Started:** MPD/the City have not yet begun to actively coordinate with us to begin working on a stated training goal because the underlying policy relevant to that training has yet to receive our approval.

We use the following categories to describe the state of progress for **audit** goals (as of the end of the Review Period):

- **Completed:** We have completed the stated audit goal and are able to determine the quality of performance of the underlying activity in relation to Settlement Agreement requirements.
- **Still In Progress:** We are continuing to complete the work of the stated audit goal and have not yet gathered sufficient data to determine the quality of performance of the underlying activity in relation to Settlement Agreement requirements.
- **Postponed:** A mutually agreed upon revision of the expected target date which can allow for the reprioritization of the stated audit goal to be achieved later.
- **Not Yet Started:** We have not yet begun the audit activity because the audit methodology has not yet been completed.

Defined Terms for Compliance Status

The Agreement defines Full and Effective compliance in Part 12, ¶440:

440. Full and Effective Compliance. *To achieve “Full and Effective Compliance,” the City and MPD must demonstrate by a preponderance of the evidence that they have, for the period stated below, demonstrated sustained compliance by incorporating all requirements of this Agreement into policy, trained relevant personnel as necessary to fulfill their responsibilities pursuant to the requirements, and held employees accountable for carrying out the requirement in practice. The City and MPD are not required to satisfy a specific numerical test to demonstrate Full and Effective Compliance so long as they demonstrate substantial adherence to the requirements, continual improvement, and they have met the overall purpose of the Agreement’s provisions. Non-compliance with mere technicalities, or temporary or isolated failure to comply during a period of otherwise sustained compliance, will not constitute failure to achieve or maintain Full and Effective Compliance. At the same time, temporary compliance during a period of otherwise sustained non-compliance will not constitute Full and Effective Compliance with this Agreement. The contract with the Independent Evaluator will provide that the contract terminates if the Court finds that the City and MPD have reached Full and Effective Compliance with the Agreement.*

Additionally, we define the various status of compliance for each paragraph of the Agreement using the following scale from the Evaluation Plan:

<p>Compliant. All material elements of the requirement (paragraph or Part) have been sustainably implemented.</p>
<p>Partially Compliant On-Track. One or more material elements of the requirement have been sustainably implemented and MPD is progressing toward compliance consistent with this Implementation Plan, as may be modified by the Parties</p>
<p>Partially Compliant Off-Track. One or more material elements of the requirement have been sustainably implemented but MPD is not progressing toward compliance consistent with the Implementation Plan, as may be modified by the Parties.</p>
<p>At Risk. The status indicates that MPD is facing the prospect of either not making further progress or becoming non-compliant.</p>
<p>Non-compliant. No elements of the requirement have been sustainably implemented.</p>
<p>Not yet measured. The IE Team has not yet assessed compliance with the requirement.</p>
<p>Not applicable. This would apply to requirements that have been eliminated, rendered moot, or are no longer operative.</p>

Glossary of Acronyms and Terms

ABLE – Active Bystandership for Law Enforcement
ATP – Annual Training Plan
BCR – Behavioral Crisis Response
BWC – Body Worn Camera
CAO – City Attorney’s Office
CCPO – Community Commission on Police Oversight
CDM – Critical Decision-Making (Model)
CIT – Crisis Intervention Team
ECO – Expanded Course Outline
EIS – Early Intervention System
ELEFA – Effective Law Enforcement for All
FIT – Force Investigation Team
FRB – Force Review Board
FTO – Field Training Officer
IA / IAD – Internal Affairs / Internal Affairs Division
ICC – In-Car Camera
IE – Independent Evaluator
IT – Information Technology
MDHR – Minnesota Department of Human Rights
MECC – Minneapolis Emergency Communications Center
MPD – Minneapolis Police Department
MVVG – Mission, Vision, Values, Goals
NACOLE – National Association for Civilian Oversight of Law Enforcement
NDP – Non-Discriminatory Policing
OCS = Office of Community Safety
OPCR – Office of Police Conduct Review
PAC – Professional Advisory Committee
PTE – Police Training and Education (Director)
QAR – Quality Assurance Review
QRP – Quarterly Review Panel
RFP – Request for Proposals
SOP – Standard Operating Procedure
SSCA – Stops, Searches, Citations and Arrests
TNA – Training Needs Assessment

UOF – Use of Force

“Agreement” – Refers to the Settlement Agreement between the City of Minneapolis and the Minnesota Department of Human Rights that commits the City to achieving reforms of MPD's policies, trainings, and practices.

“City” – The City of Minneapolis government and its various departments

“Evaluation Plan” – The Implementation Progress Evaluation Plan published by the IE which outlines the expectations for progress under the Agreement from 2024-2028

“Part” – Refers to one of the 12 sections of the Settlement Agreement

“Progress Review” – The formal designation for this report, also referred to as a semiannual report

“Review Period” – Refers to the six-month duration listed on the cover of this report

“Next Review Period” – Refers to the next six-month duration following the one listed on the cover of this report



Minnesota Department of Human Rights
540 Fairview Ave N, Suite 201
St. Paul, MN 55104

January 14, 2026

Effective Law Enforcement for All
Independent Evaluator

Via Electronic Communication

Re: State of Minnesota by Rebecca Lucero, Commissioner of the Minnesota Department of Human Rights v. City of Minneapolis, Court File No. 27-cv-23-4177

Dear Effective Law Enforcement for All,

The Minnesota Department of Human Rights (MDHR) submits this letter in response to the third semi-annual monitoring review issued by the Independent Evaluator, Effective Law Enforcement for All (ELEFA). We hope this letter can provide areas of prioritization as the City of Minneapolis (City) and the Minneapolis Police Department (MPD) move into this next year, as well as continued transparency for community members on the tremendous amount of work ahead for the City. MDHR also hopes this letter serves the Honorable Judge Janisch with needed context for reviewing progress and ongoing challenges under the court-enforceable consent decree.

As the City and MPD move into this next year, prioritizing the following areas to address the root causes of race-based policing will continue to build a culture of continuous learning, grounded in humanity and civil rights.

Focus on developing training that utilizes critical thinking with a human-centered approach

MPD developed curriculum for a new Health and Wellness course that takes a human-centered approach to officer well-being and anticipates delivering this training during the next review period. Additionally, MPD developed and delivered a training focused on supervisor leadership. MDHR recommended that ELEFA approve these thoughtfully designed trainings, which exemplify evidence-based approaches, and reflect the guiding principles of the consent decree, particularly in their use of appropriate language, framing and approach. Similarly, MPD developed a three-day use of force training focused on de-escalation and applying a critical decision-making model through classroom and scenario-based learning grounded in adult learning principles. MDHR encourages the City and MPD to continue developing future trainings that similarly align with these principles and models of learning. These trainings are foundational steps toward reducing unnecessary force and helping officers respond more effectively in high-pressure situations.

Training remains in an early phase. To continue to effectuate quality training moving forward, the City and MPD need to focus on two key areas:

- **Highly skilled policy writers are needed to draft and finalize policies.** As noted in ELEFA’s third progress report, of the 16 policies to be completed in the first year of the evaluation plan, ten remained incomplete. Some of these policies are relatively narrow in scope, while others are substantial policies. All policies are essential. Without these policies in place, MPD is unable to move forward in developing and implementing quality trainings. Furthermore, the City and MPD are not able to hold officers accountable to policies that are not yet written, finalized, approved, and trained.
- **Integrate a thoughtful plan to roll-out and implementation.** Too often, City and MPD leadership are taking a fragmented approach to policy, training, and overall implementation where a more coordinated approach would better support MPD officers and community members. This fragmented approach is not surprising because the City and MPD are still in the very early foundational parts of this work and only recently hired a Bureau Chief responsible for overall guidance of the implementation process. As the Bureau Chief fully takes on the responsibilities of this essential position it is expected that policy, training, and implementation will stop unfolding in a such a fragmented and disconnected manner as the City and MPD are able to focus attention on coordinated sequencing.

Focus on Implementing a Cohesive Accountability System

We commend the City and MPD for finalizing and receiving approval from ELEFA on the Internal Affairs (IA) Investigation Manual and the Office of Police Conduct Review (OPCR) Manual. These documents lay the groundwork for a fair and effective oversight system that, if implemented with fidelity, can increase public confidence and strengthen public safety. We also recognize improvements in the structures of the Community Commission on Police Oversight (CCPO) and the disciplinary review panels. Importantly, the Office of Police Conduct Review (OPCR) sustained its progress despite leadership transitions. While it has not yet been evaluated, the robust data and analysis OPCR provides to the CCPO demonstrates a commitment to transparency and ensures OPCR has the data necessary to strategically manage its case inventory through a continuous improvement model.

The City and MPD remain far from full implementation of a cohesive accountability system. While we applaud the important progress noted above, the City and MPD remain far from full implementation of a cohesive accountability system. Work is still underway to finalize key components, including the misconduct policy for IA and OPCR, a policy and manual for the Force Investigation Team (FIT), an updated discipline matrix, quality, integrated data systems, and a well-delivered training. These accountability components must work together as a unified system. Until they are complete and aligned, it will be impossible for the City and MPD to begin full implementation and assess whether the accountability systems are effective in practice in the real world and there will continue to be unclear and inconsistent outcomes on investigations. The decision by City and MPD leadership to pursue a FIT review in lieu of an actual IA or OPCR investigation illustrates how the accountability system remains unclear and inconsistent. As noted by ELEFA, the investigations that do occur are not yet being evaluated for quality or accuracy.

To effectuate a quality, cohesive accountability system, the City and MPD need to prioritize the development of high-quality data systems that allow them to assess progress, identify gaps, and make informed decisions.

A strong, reliable data infrastructure is central to any effective accountability system, and to an organization committed to continuous improvement grounded in humanity and civil rights. There are two examples illustrated throughout ELEFA's reports where lack of quality data means the City and MPD are unable to assess progress and make informed decisions:

- **Quarterly Review Panels.** The quarterly MPD Review Panels provide an opportunity for MPD Command Staff to review, analyze, and assess MPD's enforcement practices. The Quarterly Review Panels enable MPD Command Staff to proactively set the tone as well as clearly define what types of enforcement practices are authorized and which are not. In its second progress report covering October 2024 through March 31, 2025, ELEFA noted that the City and MPD were not able to sufficiently evaluate the data to meet the required goals of Quarterly Review Panels (QRP). This remains true today. MPD and the City still do not yet have the data systems and capacity for rigorous data analysis. While we commend MPD for meeting and reviewing what data they can, without the ability to conduct any meaningful statistical analysis, MPD leaders cannot assess whether enforcement activities are applied in a non-discriminatory manner or identify patterns that might be indicators of bias.
- **Internal Affairs Data.** In both its second and third progress reports, ELEFA noted that Internal Affairs (IA) had serious limitations around its data. However, since both OPCR and IA utilize the same database, IA should quickly resolve its data and analysis problems to align with the quality analysis provided by OPCR. Accurate data means leadership can meaningfully evaluate MPD's practices to determine what support might be needed to improve public safety and support officers.

As outlined in Minnesota Department of Human Right's April 2022 investigative findings, MPD maintains an organizational culture where MPD officers use higher rates of more severe force against Black individuals compared to white individuals in similar circumstances. The investigation also found MPD officers are more likely to stop vehicles with people of color and Indigenous individuals because of their race, and MPD officers treat Black and white individuals differently during traffic stops because of race. To date, the City's and MPD's accountability and oversight systems are insufficient and ineffective at holding officers accountable for these discrepancies. Without full implementation of a cohesive accountability system, these findings cannot be adequately addressed. MDHR encourages leadership to support the work of building a culture of continuous learning and continuous improvement.

Focus on Aligning Vision and Action

MDHR recognizes that City and MPD leadership are able to communicate a vision of a public safety system grounded in humanity and civil rights. Their vision is on display as Minnesota is facing extreme public safety challenges in the face of federal immigration actions. As this tragedy is occurring, City and MPD leadership continue to reiterate a deep commitment to the work they are undertaking as part of this consent decree – and have publicly declared full ownership of this transformational work. This clear messaging from leaders provides a solid foundation for organizational alignment and engagement.

However, there continues to be a gap between the articulated vision and the actions currently being taken by leadership. The challenges outlined above reflect the need for consistent values-driven leadership and strategic alignment. Hiring a Bureau Chief with a history of leading with a human-centered lens is a promising step.

As detailed throughout its report, ELEFA repeatedly notes that City and MPD leadership lack the necessary buy-in as demonstrated from a lack of coordinated leadership. ELEFA reports that this lack of coordination results in problems with morale and challenges to implementation. In its second progress report, ELEFA had these same concerns, noting, “Organizational change management requires continuous, purposeful communication from leadership to ensure employees are accepting and supportive of culture change.”

ELEFA’s comments reiterate what MDHR found in its 2022 findings and continues to be true today. Through our investigation, MDHR found that the pattern or practice of discriminatory, race-based policing is caused primarily by an organizational culture, which includes former and current City and MPD leaders. Those leaders have not collectively acted with the urgency, coordination, and intentionality necessary to address racial disparities in policing to improve public safety and increase community trust. Reforming MPD’s policies, procedures, and trainings will be meaningless without focused attention to organizational culture change.

City and MPD leadership’s ability to strategically coordinate will allow the City and MPD to translate their vigorous stated support for policing grounded in humanity and civil rights into the durable organizational change necessary to address racial disparities in policing to improve public safety.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca Lucero', with a stylized flourish at the end.

Rebecca Lucero
Commissioner
Minnesota Department of Human Rights