



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

# INDEPENDENT EVALUATOR PROGRESS REVIEW REPORT

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

REVIEW PERIOD  
March 18, 2024 - September 30, 2024

 [outreach@elefamn.org](mailto:outreach@elefamn.org)

 [www.elefamn.org](http://www.elefamn.org)

## Table of Contents

List of Acronyms and Terms .....	3
Preface .....	4
Note on Publication of the First Progress Review .....	5
Executive Summary.....	6
Key Achievements and Challenges Identified During the Review Period:.....	7
Policy (Part 2).....	7
Non-Discriminatory Policing (Part 3).....	7
Use of Force (Part 4) .....	7
Stops, Searches, Citations, Arrests (Part 5).....	8
Body Worn Cameras and In-Car Cameras (Part 6) .....	8
Training (Part 7) .....	8
Officer Support and Wellness (Part 8).....	8
Mental and Behavioral Health Crisis Support in the Field (Part 9).....	8
Accountability and Oversight (Part 10).....	8
Data Systems, Analysis, and Transparency (Part 11).....	9
IE Team Engagement Efforts .....	9
Expected Progress for Next Review Period.....	10
Summary Status of Paragraphs in Compliance or Partial Compliance .....	10
Discussion.....	11
1. 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.....	11
Policy-Related Activities (Part 2) .....	11
Non-Discriminatory Policing (Part 3) .....	13
Use of Force Related Activities (Part 4).....	13
Stops, Searches, Citations, and Arrests Related Activities (Part 5) .....	14
Body Worn Cameras and In-Car Cameras (Part 6) .....	14
Training-Related Activities (Part 7) .....	15
Officer Support and Wellness and Early Intervention (Part 8).....	16
Mental and Behavioral Health Crisis Support in the Field (Part 9) .....	18
Accountability and Oversight (Part 10) .....	19
Data Systems, Analysis, and Transparency (Part 11).....	21
2. Description of Work Conducted by the IE Team During the Reporting Period .....	23
IE Process for Policy and Training Reviews .....	23
IE Team Reviews of Updated Policies and Training.....	24
IE Team Community Outreach Efforts .....	25
IE Team Engagement of MPD Officers and City Staff .....	26
3. Expected Progress for Next Reporting Period .....	27
Progress on Year 1 Implementation Goals.....	27
Anticipated Progress during the Next Reporting Period .....	29
Policy (Part 2).....	29
Non-Discriminatory Policing (Part 3).....	29
Use of Force (Part 4) .....	29

Stops, Searches, Citations, Arrests (Part 5).....	29
Body Worn Cameras and In-Car Cameras (Part 6) .....	29
Training (Part 7) .....	29
Officer Support and Wellness (Part 8).....	29
Mental and Behavioral Health Crisis Support in the Field (Part 9).....	30
Accountability and Oversight (Part 10) .....	30
Data Systems, Analysis, and Transparency (Part 11).....	30
4. Status of Compliance with Settlement Agreement Requirements.....	31
5. Technical Assistance Provided by the IE Team During Review Period .....	34

## List of Acronyms and Terms

ATP	Annual Training Plan
BWC	Body Worn Camera
CAD	Computer Aided Dispatch
CCPO	the City's Community Commission on Police Oversight
CDM	Critical Decision Model
CIT	Crisis Intervention Team
EIS	Early Intervention System
ELEFA	Effective Law Enforcement for All, the organization selected as Independent Evaluator
EWM	Engaging with Minors
FIT	Force Investigation Team
IAD	Internal Affairs Division, a part of the Minneapolis Police Department
ICC	In Car Camera
IE or IE Team	The Independent Evaluator of the Agreement
ILC	Implementation Liaison Council
MCIT	State of Minnesota Crisis Intervention Team
MDHR	Minnesota Department of Human Rights
MPD	Minneapolis Police Department
MVVG	Mission, Vision, Values, Goals
NACOLE	National Association of Civilian Oversight of Law Enforcement
NDP	Non-Discriminatory Policing
OPCR	Office of Police Conduct Review
RFP	Request for Proposals
SBT	Scenario-Based-Training
SOP	Standard Operating Procedures
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 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
“Progress Review”	The formal designation for this report, also referred to as a semiannual report

## Preface

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 first Progress Review for the period beginning March 18, 2024 (when the IE Team’s contract became effective) through September 30, 2024. The requirements for the Progress Review are outlined below:

### ***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.***

## Note on Publication of the First Progress Review

In this first Progress Review, the IE Team provides a summary of City/MPD activities that have taken place only within the described review period (March – September 2024) as required by the Agreement. It does not outline the City/MPD activities related to Agreement compliance that are known to be in progress or ongoing between the end of the review period and the publication of this semiannual report. Such activities will be reported to the public in the IE Team’s next semiannual report which will cover the review period of October 1, 2024 through March 31, 2025.

In accordance with the requirements of paragraph 414, the IE Team is required to submit a draft of each Progress Review to the Parties at least 30 days prior to publication, to allow the Parties to comment on its contents.

The IE Team has spent considerable effort in familiarizing itself with the various stakeholders within the Minneapolis community as well as how the MPD operates and the resources they have available to address Agreement requirements. The IE Team requested additional time from the Parties in creating this first Progress Review so that it could provide a comprehensive starting point for updating the public on the City and MPD’s activities toward compliance.

Progress Reviews submitted by the IE Team on a semi-annual basis are designed to provide status updates on MPD and the City’s progress implementing the Evaluation Plan, compliance status, and the IE’s work.

The IE Team delivered its first submission of this Progress Review to the Parties on December 9, 2024, and received feedback from the Parties on January 16, 2025.

***To provide comments or feedback about this Progress Review please send an email to [outreach@elefamn.org](mailto:outreach@elefamn.org)***

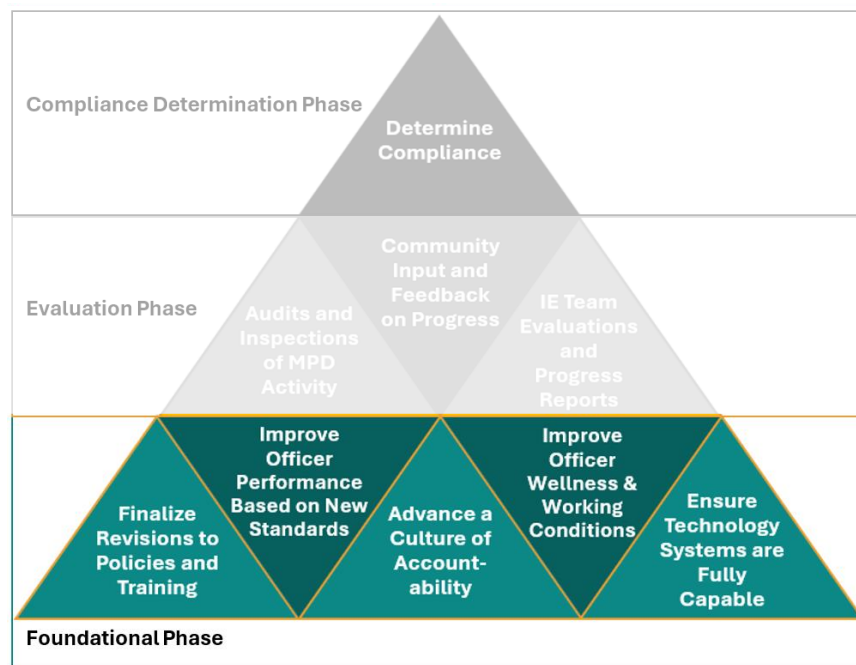
***To learn more about the Settlement Agreement and the work performed by Effective Law Enforcement for All (ELEFA) who serves as the Independent Evaluator of the Settlement Agreement, or for details about our next public meeting in Minneapolis, visit our website at:***

***<http://elefamn.org>***

## Executive Summary

During the review period<sup>1</sup>, the IE Team’s efforts consisted primarily of learning about Minneapolis and its people. The IE Team met with elected and appointed officials, numerous community groups and individuals, and MPD personnel to understand their concerns and learn about their expectations for how the Agreement can bring positive change to the MPD. The IE Team also attended numerous MPD roll calls and rode along with MPD officers to hear and understand their experiences, concerns, and aspirations for the future of MPD. The IE Team also met with MPD command staff to hear their concerns and toured MPD facilities to make observations about working conditions, especially those areas dedicated to officer wellness.

Consistent with the Evaluation Plan, the IE Team’s attention and priority during the review period is on the Foundational Phase of compliance efforts. As illustrated in the diagram below, the activities in this phase (policy revision, training, accountability structures, officer wellness, technology implementation) are fundamental requirements that must be completed before the MPD can enter the Evaluation Phase (through audits, inspections, evaluations, solicitation of community feedback) to allow for the IE Team to make determinations of compliance for a significant majority of the Agreement’s requirements.



The IE Team’s implementation efforts during the review period consisted primarily of working with the Parties on drafting policies and observing training scheduled to be completed by the end of Year 1; March 17, 2025. The IE Team has also supported the City’s efforts in developing plans to eliminate its misconduct and use of force review backlogs.

<sup>1</sup> References throughout this report to “review period” includes activities during the first six months of the IE Team’s work: March 18, 2024 – September 30, 2024.

## Key Achievements and Challenges Identified During the Review Period:

### Policy (Part 2)

- Revised policies in core areas are being drafted. The MPD anticipates meeting most, if not all, of the policy deadlines by the end of Year 1 (March 2025). The IE Team and Parties have agreed to work collaboratively on drafting policies to expedite the policy drafting process.
- MPD has been thorough in tracking, reviewing, assessing, and considering public feedback on published policies.
- MPD submitted the following policy areas (which consisted of multiple policies for each) for formal review and approval by the IE Team and MDHR:
  - Use of Force
  - Engaging with Minors
  - Crisis Intervention
- MPD sought informal feedback on the policing policies:
  - Adult Citations and Arrests
  - Duty to Report
  - Early Intervention System
  - Internal Affairs Division (“IAD”) Standard Operating Procedures
  - Office of Police Conduct Review (“OPCR”) Standard Operating Procedures
- MPD posted the following draft policies for public feedback during the review period:
  - Mission, Vision, Values, Goals (“MVVG”)
  - Use of Force
- The IE Team expects that MPD will make the following policies available for public comment during the next review period:
  - Non-Discriminatory Policing
  - Stops, Searches, Arrests, Citations
  - Engaging with Minors
  - Crisis Intervention

### Non-Discriminatory Policing (Part 3)

- The MPD’s Implementation Team has been working on drafting and updating Non-Discriminatory Policing policies throughout this review period. Posting of those policies for public feedback occurred in September 2024.

### Use of Force (Part 4)

- In a report forwarded to the IE Team on September 2, 2024, FIT reported that there were 1,111 force cases that had yet to be reviewed to verify compliance with policy. This included 638 level-1 cases, 458 level-2 cases that needed to be triaged and required Quality Assurance Reviews, and 15 critical incidents cases (level-3), presenting a major compliance challenge. Addressing this will depend on MPD’s ability to assign additional personnel to the task.



## Stops, Searches, Citations, Arrests (Part 5)

- MPD has been drafting and updating Stop/Search/Citation/Arrest (“SSCA”) policies throughout this review period and the vast number of related policies are expected to be completed and submitted to the IE Team and MDHR for formal review during the next review period.

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

- MPD’s Body-Worn Camera (“BWC”) system shows progress but will require finalizing policy updates before full compliance can be assessed.

## Training (Part 7)

- Initial training modules, such as refresher Crisis Intervention training, have been implemented.
- Leadership and supervisor training was delayed, requiring focused attention and follow-up.
- The IE Team has provided feedback on formal training submissions in the areas of Crisis Intervention and Engaging with Minors, and informally on Use of Force.

## Officer Support and Wellness (Part 8)

- MPD completed assessments for facilities, equipment, and employee wellness, but initial plans required revisions to meet compliance; updated submissions are under evaluation by the IE Team
- The IE Team has emphasized prioritizing officer wellness through improved facilities, comprehensive plans, and robust service provisions, though progress remains slow due to resource and provider challenges.
- Officer safety and wellness programs need continued prioritization and additional resources but are staffed with diligent and competent personnel.
- Early Intervention Systems are under active development and on schedule, with phased deployment expected over 24 months and ongoing monitoring of progress and effectiveness.

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

- During this review period, the IE Team was unable to assess requirements outlined by Part 9 of the Agreement due to a lack of available data.

## Accountability and Oversight (Part 10)

- The City and MPD are making progress toward eliminating the IAD and OPCR backlog on misconduct investigations and quality assurance reviews of uses of force. The City has contracted with an external investigation firm to support OPCR cases during the review period and is scheduled to bring similar capacity for IAD cases and quality assurance review of use of force reports in the 4<sup>th</sup> quarter of 2024.

- IE Team interactions with IAD and OPCR personnel highlighted resource shortages including inadequate staffing for key positions and inefficient technology systems that impact progress towards implementation, capacity building, and tackling case backlogs.
- IAD and OPCR have developed standard operating procedures for misconduct cases and some reductions in case backlog have been achieved.
- OPCR has engaged community organizations to educate them about the services provided by OPCR and the City’s Department of Civil Rights.

### Data Systems, Analysis, and Transparency (Part 11)

- The City and MPD have created dashboards for public transparency, but functionality requires enhancement.
- Current IT systems limit the effectiveness of compliance efforts; however, the City is actively pursuing various IT implementation efforts, along with developing the Data Systems Plan, to align its IT architecture with Agreement requirements.

### IE Team Engagement Efforts

- The IE Team has also posted on our website a community map, which identifies organizations involved in policing, their mission, and their connections to other Minneapolis organizations. The map can be accessed through the QR code:
- The IE Team has begun to implement a robust community engagement strategy, meeting with diverse groups representing many communities in Minneapolis. This strategy includes public sessions, a community partner to promote implementation activities, community mapping, and a proposed Implementation Liaison Council. Interested individuals or organizational representatives can apply by emailing [outreach@elefamn.org](mailto:outreach@elefamn.org) with “Applying for ILC membership” as the subject.
- The IE Team is also accepting applications to serve as our Community Engagement partner, whose role will be to help promote broad-based community engagement efforts in the implementation process, as reflected in both the letter and spirit of the Agreement. More information as well as the application to serve as our Community Engagement partner, can be found [here](#).
- Questions about the community map, the local engagement partner, or the ILC can be submitted through our website at [www.elefamn.org](http://www.elefamn.org).



## Expected Progress for Next Review Period

This section provides a brief overview of major work items expected to occur during the next review period (October 1, 2024 – March 31, 2025). A full listing of all expected work items can be found in Section 3 of this report.

Part	Major Work Item During Next Review Period
Part 2 (Policy)	Finalize and submit policies on Mission/Vision/Values/Goals with public feedback incorporated.
Part 3 (NDP)	Submit finalized Non-Discriminatory Policing policies to IE Team and MDHR after public feedback.
Part 4 (Use of Force)	Ensure compliance for finalized policies and their integration into training curriculum.
Part 5 (SSCA)	Finalize and evaluate policies with public feedback before training begins.
Part 6 (BWC)	Complete compliance review of final policies and maintenance systems.
Part 7 (Training)	Review and integrate Engaging with Minors policy and crisis intervention training into curriculum.
Part 8 (Wellness)	Finalize Employee Support Plan and Facilities, Equipment, & Non-Database Technology Plan.
Part 9 (Mental Health)	Produce baseline data for mental health crisis response and for overtime hours from MPD members.
Part 10 (Accountability)	Clear IAD/OPCR backlog and implement new case management software.
Part 11 (Data)	Submit and review Data Systems Plan with IE Team.

## Summary Status of Paragraphs in Compliance or Partial Compliance

Part	Compliant	Partially Compliant – On Track
Part 2 (Policy)		
Part 3 (NDP)		
Part 4 (UOF)		
Part 5 (SSCA)		
Part 6 (BWC)		172, 173, 178
Part 7 (Training)		235, 236
Part 8 (Wellness)	254, 255	246, 247, 248, 256
Part 9 (Mental Health)		
Part 10 (Accountability)		
Part 11 (Data)	361, 362	363

## Discussion

### 1. 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

#### Policy-Related Activities (Part 2)

The IE Team acknowledges the challenging task that the drafting and revision process presents. Policies need to balance different purposes. They must provide clear, accurate, and comprehensive guidance to officers, yet also be concise and easily understood. Achieving this balance is a time-consuming process.<sup>2</sup> These challenges notwithstanding, MPD has set an ambitious schedule for policies to be completed by the end of Year 1 of the Evaluation Plan. To facilitate meeting its targets, the IE Team established biweekly meetings between MPD's policy team and the IE Team Lead for policy. The meetings have been very collaborative thus far, and MPD is working hard to revise their policies in compliance with the Agreement and satisfy the various – and sometimes competing – needs of all stakeholders (including MPD leadership, MPD rank and file members, the community, Agreement requirements, law, IE Team recommendations, and MDHR feedback).

The Parties and the IE Team agreed to an “informal” policy feedback process that will improve and streamline policy drafting and approval. This process occurs before the formal feedback period specified under the Agreement and allows the IE Team to assist MPD in the policy development process at the MPD or City's request. This informal feedback typically entails a broad review of the draft policy content but does not represent the IE Team's final assessment of whether the draft policy fully satisfies the Agreement's requirements. It also promotes early identification of potentially significant deficiencies so they can be addressed in policy drafting, thus expediting the formal review process.

MPD has included a cross-reference of the Agreement's requirements to the relevant policy provisions with its formal submissions, which the IE Team appreciates. During the review period, the IE Team reviewed the community feedback received by MPD on its draft Use of Force policies during the Summer and Fall 2023 community sessions and the MPD's comments on each piece of feedback. The MPD has been very thorough in tracking, reviewing, assessing, and considering public feedback. MPD was also thorough in tracking and evaluating whether it believed each comment was already covered in policy, could be added to a policy, was not actionable, or not feasible for policy inclusion. MPD showed its commitment and diligence through its extensive accounting of the feedback.

In June 2024, MPD re-posted for public comment the updated drafts of its use of force policies, to ensure it was fulfilling ¶128, which contemplates MPD posting the proposed drafts of its four core policy areas prior to issuance. MPD received additional community

---

<sup>2</sup> An overview of how the IE Team evaluates policies was presented at our November public meeting. A link to that portion of our presentation can be found [here](#).

feedback during this re-posting, which it considered for its latest drafts of the use of force policies. As of September 30, 2024, these use of force policies continued to undergo collaboration between the Parties and the IE Team and are slated to be completed during the next reporting period.

On September 20, 2024, MPD posted for the required 45-day public comment period, the following policies:

- Preface Section of the Policy Manual (related to Mission, Vision, Values, Goals),
- Emergency Medical Response, and
- Transportation of Arrestees.

MPD policies posted for public comment can be found [here](#).

During the reporting period, the IE Team worked with MPD and the City to identify deficiencies in policy-writing capacity that could hamper MPD's ability to fulfill the Evaluation Plan deadlines. In response, the City has undertaken to hire additional policy writers.<sup>3</sup>

MPD officers have expressed frustration at the hard-to-navigate Policy Manual, which is a 700+ page PDF file. The current process requires officers to hunt through a cumbersome and lengthy document to determine what actions they are supposed to take (or not take) in response to various situations. MPD reports that it is working with IT to implement a new policy management system expected to reduce the burden on officers (and the public) in navigating MPD policies. The IE Team expects progress will be made on this effort, which will be reported on during the next Review Period.

Community organizations, including the City's Community Commission on Police Oversight (CCPO), expressed frustration at MPD's process for soliciting public feedback on draft policies. The frustrations concerned lack of notice, lack of time to review voluminous policies, and lack of transparency concerning how, if at all, public feedback was considered. The CCPO also expressed frustration that it was not being afforded its right under ordinance to review draft policies. The IE Team observed that the statute that confers that right does not specify the form or provide a schedule for soliciting or providing the feedback. Nevertheless, the IE Team worked with the MPD to find a reasonable balance between the Agreement's feedback provisions, which are both demanding and strict, and the understandable desire of the CCPO and other interested groups for meaningful input. The IE Team believes some progress on this issue has been made. For example, the MPD has agreed to proactively notify the CCPO when it posts policies for public feedback. The IE Team will continue to work with the MPD to find a practical, feasible solution to the concerns. Ultimately, the spirit of the Agreement calls for robust community input on policies, which is also considered a best practice.

---

<sup>3</sup> After this reporting period ended, MPD was able to hire another full-time policy writer to join its policy team and posted a Request for Proposals (RFP) for additional policy writing capacity.

## Non-Discriminatory Policing (Part 3)

The MPD's Implementation Team has been working on drafting and updating Non-Discriminatory Policing ("NDP") policies throughout this review period. Posting of those policies for public feedback occurred in September 2024. Submission by MPD for review and collaboration is anticipated to occur in December 2024 (during the next review period.) Once policies have received public feedback, the IE Team will coordinate with the Parties on policy finalization according to Agreement requirements.

## Use of Force Related Activities (Part 4)

MPD submitted draft Use of Force ("UOF") policies to MDHR and the IE Team for formal review and comment. MPD also received community feedback, after posting the draft policies for the required period. MDHR and the IE Team have completed their feedback on the formal policy submissions and as of the end of this reporting period, were awaiting a revision and resubmission/reposting of the Use of Force policy drafts.<sup>4</sup>

The IE Team met with the MPD Internal Affairs Division ("IAD") to discuss the status of Use of Force provisions within the Agreement. IAD outlined its efforts to create the Force Investigation Team ("FIT") but expressed that it lacked sufficient staffing to complete some of the major tasks the Agreement requires. While FIT has been loaned two IAD Sergeants, these Sergeants are still required to complete their previous IAD caseloads, estimated to be between 12-15 cases each, before they can be permanently assigned to FIT. The FIT Lieutenant also stated that they were able to hire two civilian investigators to augment the FIT, but they are currently undergoing intensive training (to be completed after several months) to prepare them to become effective UOF investigators.

The IE Team also coordinated with FIT to develop a plan of action on how to address the UOF case backlog problem, given the current staffing challenges. FIT reported that it had over 1,100 use of force cases in backlog (as of 9/30/24) that had not received final review and approval as required by the Agreement. While over 600 of these cases involve only Level 1 categories of force (the lowest/least impactful force category), more than 400 potentially contain more significant instances of force (Level 2 or Level 3). MPD did not know what actual level these cases are as they have not reviewed and categorized them yet. Of greater concern, 15 more cases considered critical incidents (such as Officer-Involved-Shootings) were still waiting for final review and approval by the FIT Unit and senior MPD staff. While there may be an opportunity to enhance processes or procedures for clearing this backlog, it was clear that FIT will require additional staff resources if the backlog is to be eliminated before the end of Year 1.

Based upon this meeting with FIT, the IE Team met internally and discussed how to present potential solutions to MPD to address the use of force case backlog problem. After extensive deliberations, a list of potential solutions was developed and provided to MPD, to include

---

<sup>4</sup> Since this reporting period ended, the IE Team has engaged in robust collaboration with the Parties on the updated Use of Force policies drafts, which the IE Team will report on in its next Progress Review report. Use of Force training will commence in Year 2 and the IE Team will begin audits after training is completed.

engaging outside vendors to assist with the backlog as well as MPD Lieutenants throughout the department who will be given training and guidance on how to properly conduct a use of force review, and then will be given the responsibility to complete a review of a set number of backlogged cases (on a one-time basis).

The IAD also has another case backlog problem involving IAD investigative cases (misconduct cases), which is further explained in the Accountability and Oversight discussion provided later in this section. MPD stated they are in the process of hiring a vendor to address both backlogs.

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

MPD has been drafting and updating Stop/Search/Citation/Arrest (“SSCA”) policies throughout this review period and the vast number of related policies are expected to be completed and submitted to the IE Team and MDHR for formal review during the next review period. The SSCA policy suite contains several policies and sub-sections, which address the requirements and topics covered under Part 5 of the Agreement, and which will undergo review and collaboration during the next review period. Once submitted, the IE Team will review and assess these draft policies for compliance with the requirements under Part 5 of the Agreement. This policy approval process must proceed prior to training commencing on SSCA related topics.

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

The City IT Department and MPD have developed a ticketing system for repairing Body Worn Cameras (“BWC”) and In Car Cameras (“ICC”). The MPD Implementation Unit has developed a process for auditing BWC activations, BWC policy compliance, and ICC functionality. Additional information on the methodology and criteria for audit and evaluation is needed from the BWC Quality Assurance Unit to review whether the auditing process is sufficient. The current BWC policy does not yet fully comply with the Agreement, although there are many provisions (such as what an officer should do when cameras are not working properly, or when cameras must be used) that are compliant. A line-by-line review and editing of the policy is underway and should be delivered to the IE Team and MDHR to review during the next review period.

During site visits to all precincts, there appeared to be sufficient BWCs for all patrol officers and supervisors on duty and adequate BWC charging stations. In future review periods, the IE Team will continue to conduct inspections of BWCs at MPD facilities to ensure that BWCs are consistently available.

During ride-alongs, the IE Team observed officers using the ICC system. The ICC system operates internal cameras within a marked police vehicle to observe subjects that are placed into custody and transported. Feedback from the officers on the ICC system was mostly positive. The City has provided documentation that as of January 2024 all ICC systems were operational except for one unit (whose vehicle was being repaired). The MPD Implementation Unit stated that the City was working on a “ticketing system” to handle

repair and maintenance requests when ICCs are not operating properly. Once completed, the IE Team will review this system to determine if it is compliant with ¶178.

During ride-alongs, officers expressed frustration about having to manually copy and paste and label BWC videos with the appropriate CAD incident numbers and call types. The IE Team brought this to MPD's attention. MPD responded that the system's accuracy is questionable. Consequently, this feature was deactivated in 2019. MPD indicated it will inquire of the vendor whether the accuracy of this feature has been improved and whether it could be reintroduced cost effectively.

## Training-Related Activities (Part 7)

The Use of Force suite of policies and trainings are significant and are scheduled to be delivered first among the major core training topics outlined in the Agreement (Use of Force, Stops/Searches/Citations/Arrests, Misconduct, and Non-Discriminatory Policing). The IE Team met with Training Division personnel to discuss the status of the use of force training curriculum design. The IE Team reviewed some preliminary use of force training curriculum documents and was concerned that the training would not meet the Agreement's training requirements. After discussion, MPD informed the IE Team that it would review the curriculum further and address any deficiencies. Finalizing the policies and training curriculum for Use of Force topics will be a priority for the MPD and the IE Team during the next review period so that delivery of other core trainings identified in the Evaluation Plan can remain on schedule for completion by the end of Year 2.

The Training Division had indicated to the IE Team that Supervisory Force Review and Leadership training would be given to all MPD supervisors by the end of this year (as reported in the Evaluation Implementation Plan). The leadership training will be delayed till next year, however, as the City of Minneapolis is required to issue a Request for Proposal ("RFP") before selecting a training vendor. Similarly, the force review training may be delayed due to the FIT focusing on other higher priority tasks such as reducing the UOF review case backlog. The IE Team will continue to monitor this training issue. It is anticipated to be resolved during the next reporting period.

MPD (through a vendor) delivered the Crisis Intervention Team ("CIT") training refresher during the review period. The IE Team observed the training and provided feedback to the vendor that delivered the training.

The IE Team observed the Engaging with Minors ("EWM") train-the-trainer session delivered by the training vendors. The session began with the training vendors directing MPD instructors to review the content of the EWM training curriculum and be ready to comment upon it and suggest any improvements or changes to its delivery. The MPD instructors engaged actively in this task. For example, they re-shuffled the slide deck to create an order that made more sense to them. They advocated for making the Critical Decision Model the basis for debriefing the Scenario-Based-Training exercises developed by the training vendor. They pointed out that the Agreement requires use of this model to enhance critical decision making, focus on problem solving, and increase the likelihood of de-escalating potential use



of force situations. The training vendor's experts agreed, and the proposed changes were made to the curriculum.

The IE Team observed the delivery of the EWM pilot training class to an audience made up entirely of MPD command staff. This group was chosen as it would be able to offer constructive comments on the training that could be incorporated into the training before its live launch - scheduled for the following week. The MPD command staff was engaged and provided constructive comments and feedback.

The IE Team was also able to observe (virtually) MPD instructors facilitate a regularly scheduled EWM class and assume the lead role in delivering the instruction. The instructors demonstrated they understood the content and did a solid job delivering it. The IE Team observed that suggestions offered by the MPD instructors - such as the aforementioned suggestion of using the Critical Decision-Making Model to debrief the Scenario Based Training exercises - proved to be the right choice as they were able to get the participants to understand and articulate a solution to solve the scenario's problems.

The IE Team observed some miscommunication or misunderstanding between the MPD and the vendor hired to conduct the EWM training. The training content (instructor script), which was the responsibility of the vendor to develop, was not provided to the trainers prior to the first train-the-trainer session and delayed practicing delivery of the content. Additionally, the vendor failed to attend the debriefing session on the EWM pilot class delivery in person and instead attended virtually. Despite these missteps, the training overall was satisfactorily provided.

## Officer Support and Wellness and Early Intervention (Part 8)

Given the trauma the public and the police have suffered over the last several years, efforts to prioritize officer support and wellness must be a top priority in both word and action. This should be reflected throughout the chain of command and should be felt and heard by all officers. There should be tangible changes that impact all officers. Robust and stable staffing, breadth and accessibility of service provision, facility upgrades, officer needs assessments and identifiable chain of command support will be continually assessed by the IE Team.

The IE Team meets with the Health and Wellness Unit biweekly to facilitate transparent communication, relationship building and confer on action steps required for compliance. The IE Team has been impressed with the leadership and dedication demonstrated by this unit to date. MPD also completed the hiring of a new Health and Wellness Manager during the review period, an important accomplishment. The team has been making progress on key components related to Part 8 of the Agreement (Officer Support and Wellness topics) and has demonstrated commitment to the mission underlying this work, a key component for MPD to attain compliance with the Agreement.

In addition to participating in regular meetings with MDHR and the City, the IE Team also toured the patrol precinct buildings to make direct observations of wellness related facility spaces (de-escalation rooms; cot rooms; mothers' rooms; breakrooms; precinct common

areas; locker rooms; bathrooms; workout facilities, etc.) During the review period, these facilities were reported to be in generally poor condition with only minor efforts taken to make improvements since they were first evaluated during the 90-day inspection period conducted by the IE Team. As of the end of the review period (9/30/2024), the City reported that it would be refocusing their efforts to prioritize these improvements to be completed by the end of the next review period (3/17/2025).

The first Equipment and Non-Database Technology comprehensive assessment (¶246) was completed January 2024, and the Facilities assessment (¶247) was completed in February 2024. Each was provided to the IE Team in March 2024, at the beginning of the Review Period. The first draft of the *Equipment, Technology and Facilities Response Plan* (¶248) was submitted to MDHR and the IE Team in May 2024. The first iteration of the draft plan was deficient, as it contained insufficient information about anticipated dates of completion for various tasks. It also provided no information about project management strategies the City planned to undertake to ensure all items included in the plan could be completed or sufficiently funded. Comments by both MDHR and the IE Team were provided to the City with a September 2024 deadline to submit a revised plan, which the City met. The IE Team is evaluating the revised plan and will report on the state of its compliance with the Agreement's requirements in the next review period.

The Agreement also requires an MPD Employee Health and Wellness Assessment, which was completed in December 2023 by a contracted vendor. In response, the City developed a draft *Employee Support Plan*, which identified priorities toward implementing the recommendations of the Vendor's Assessment. Upon review by the IE Team, it was determined that this plan lacked sufficient detail to achieve compliance. During this review period, staffing changes and concerns over the performance of the current mental health service provider prevented further progress on the Plan's revision. The IE Team and MDHR supported the MPD's request to delay the development of an updated plan until the MPD had sufficient information to make the plan achievable.<sup>5</sup> The Health and Wellness Unit has been exploring alternate clinical service providers and is presently working with the City to issue a new RFP. (After the reporting period, the City submitted a revised plan, which was significantly improved.)

The Health and Wellness Unit is also exploring hybrid options, i.e., internal and external service providers, to achieve the important officer wellness requirements outlined in Part 8 of the Agreement. The IE Team will monitor progress with the RFP. It is a high priority to have the City 1) identify a robust and thoughtful plan which addresses Agreement requirements, 2) address concerns with the current provider and 3) most crucially, execute service provisions for critical health related services to officers and their families. Currently, the required elements are either missing or inadequate.

The IE Team met several times with the Minneapolis Emergency Communications Center ("MECC") to discuss ¶237, which requires all 911 telecommunicators to receive crisis

---

<sup>5</sup> Shortly after this reporting period ended, the IE Team has since received the revised Plan, which was significantly improved in comparison to its original submission. MPD is moving forward with developing a process for ensuring the Plan's implementation which will be reported on in greater detail during the next Progress Review report.

intervention training. This training helps telecommunicators better understand common signs and symptoms of mental health crisis, and effective ways to respond to crisis. The City has contracted with the State of Minnesota Crisis Intervention Team (“MCIT”) to deliver the required telecommunicator crisis intervention training. The IE Team awaits production and review of the curricula with sufficient time for full review and revision prior to executing the training.

The City selected a vendor, Benchmark Analytics, to develop an Early Intervention System (EIS). The vendor has begun implementation, and the IE team meets monthly with the MPD and Benchmark to monitor progress.

In meeting with MPD’s EIS Unit, The IE Team advised that policy and training development should be the first step toward implementation of the EIS. Thus, work on these items will progress while the technology implementation is in progress. The EIS Unit gave the IE Team a draft policy for informal review and technical assistance before making a formal submission. The City expects to complete the policy in the next review period.

The IE Team will not be able to assess compliance with all the EIS provisions of Part 8 until an EIS has been implemented and launched. There is a 12-month implementation schedule (which began May 2024) for a phase 1 deployment. Phase 2 would be completed 6 months after Phase 1. The full EIS implementation is expected 6 months after Phase 2. The entire project is projected to take 24 months (about 2 years), which aligns with the Agreement’s requirements (¶286). The IE Team will review the City and MPD’s assessment of EIS’ effectiveness according to ¶283. In the interim, the IE Team will participate in monthly check-ins with the City IT, the MPD EIS Unit, and the vendor’s project management team to track project implementation.

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

During this review period, the IE Team was unable to assess requirements outlined by Part 9 of the Agreement due to a lack of available data. Baseline data for this section was requested from the City but the City/MPD reported challenges in being able to respond using their current data systems. The IE Team is revising the scope of its request and will begin a more fulsome assessment of Part 9 provisions in the next review period.

Notably, ¶289 of the Agreement requires a well-resourced “Behavioral Health Crisis Response Team to be responsive across the City 24 hours a day, seven days per week.” The Agreement does not specify who should provide these services, or whether MPD is required to be a part of the service. Currently, the City has no Crisis Intervention Team program, no CIT coordinator, and had no MPD specialized response to calls involving a mental or behavioral health component. Canopy, a local non-profit, is presently providing this service, but without MPD involvement. The IE Team interviewed Canopy leadership to learn more about the program. While a non-law enforcement response is appropriate and highly recommended in certain types of 911 calls, the absence of a specialized response inclusive of MPD for 911 calls that *do* require police response goes against best practice.

Paragraph 289 requires the City to “fund and adequately resource” a Behavioral Health Crisis Response Team” but does not specify its elements. For a department and city as large as Minneapolis, there should be a robust program to ensure consistent and appropriate deployment of resources to effectively respond to individuals calling 911 who are in crisis. There are national best practices and innovative approaches to accomplishing this. The IE Team will work with the City, MPD and MDHR to develop a program that will satisfy the requirements of paragraph 289.

## Accountability and Oversight (Part 10)

The IE Team meets with IAD and OPCR personnel bi-weekly to facilitate transparent communication and support close collaboration on efforts to comply with the Agreement’s requirements related to Accountability. Nevertheless, achieving success will be challenging without the support of adequate staff and resources. To overcome the challenges ahead, it is imperative that IAD and OPCR units are equipped with the necessary tools and support to navigate the intricate process of rebuilding trust and achieving Agreement compliance.

In February 2024, OPCR and the Department of Civil Rights experienced an abrupt leadership change resulting in some instability. In March 2024, an Interim OPCR Director was selected. During the initial site visit conducted by the IE Team in Spring 2024, many OPCR employees indicated the need for more staff to assist with investigations and administrative tasks. Most of the OPCR employees reported having less than one year of experience in their current roles. From April 2024 to June 2024, four OPCR staff members left the division, adding to the already depleted resources. Employees reported that high turnover in OPCR and the loss of institutional knowledge created significant uncertainty and a strong need for structural change and stability. Changes in leadership and a lack of a clear direction were concerns expressed by OPCR employees. Many expressed frustrations over the backlog of cases that continued to build with only one OPCR staff to manage all of Intake. Additionally, OPCR staff indicated that training was insufficient to be effective and impactful in their work.

In July 2024, OPCR filled the vacant Case Manager position. During the final months of the reporting period, OPCR prioritized hiring and onboarded an additional Case Investigator in September 2024. The City also identified a candidate for the Director of OPCR, the candidate began their employment after the reporting period. The City reported that all vacant OPCR positions are expected to be filled by the end of the next review period; however, these personnel will still need to be adequately trained on OPCR operations before becoming fully capable of being assigned casework on their own.

Additional information gathered during site visits conducted by the IE Team, yielded information from IAD and OPCR employees outlining a series of fundamental issues (data inconsistencies and technical errors) with their current software systems, as well as with the past attempts to course correct data challenges. Most employees reported that it was difficult to work with the databases and systems due to these data quality issues. This led to the internal and external reporting of likely inaccurate case information (counts and statuses), making it particularly difficult to assess the compliance with terms of the

Settlement Agreement. The City's IT department has moved to procure and implement a new operating and records management system, which is expected to improve data collection and day-to-day use. The new system implementation is scheduled for completion before the next review period ends.

OPCR and IAD support staff are also overwhelmed with the new Brady reporting standards from both the City and County, which they report take up a significant amount of their time. This means they have much less time to handle IA case support (and work on backlogged cases). IAD support staff have also received an overwhelming number of requests for summary reviews of disciplinary history due to the Chief's recent directive to review disciplinary summaries before an officer is selected for a specialized (non-patrol) assignment (a directive the IE Team supports). IAD support staff also reported transcribing interview statements manually, an incredibly time-consuming task. IAD leadership reported that requests were made to obtain a new transcription service several times, but these requests have so far been denied.

IE Team interactions with employees of both IAD and OPCR over the past six months have revealed opportunities to streamline various processes within both units to avoid unnecessary steps and foreseeable delays. The IE Team has encouraged both units to assess every step of their current practices and to solicit feedback from employee focus groups to determine ways to reduce unnecessary burden and identify the causes of preventable delays with misconduct investigations and outcomes.

OPCR and IAD have been working collaboratively, with guidance from the City Attorney's Office, to establish SOPs in alignment with the Agreement's requirements. Considerable progress has been made, and the IE Team has been methodically reviewing this extensive document as portions are redrafted. Both IAD and OPCR have been incorporating feedback from the IE Team as requested and have been prioritizing internal, clear, consistent systems and language.

OPCR has worked with several community organizations to educate them on the services it provides the public. OPCR has also worked with CCPO leadership, the City Clerk's Office and Enterprise leadership to ensure CCPO has bylaws and a code of conduct. OPCR completed a draft strategic plan for the CCPO's consideration and is currently working on an Onboarding and Training Manual for CCPO as well as a recruitment policy and strategic plan, as required by the Agreement. OPCR is scheduling CCPO training, as outlined by city ordinance, and several CCPO members were expected to attend the NACOLE training in October 2024. The Department of Civil Rights has reported attending four community events between July - September 2024 to educate the community about OPCR and other services the Department of Civil Rights provides.

Progress has been made on training IAD personnel and managing the IAD backlog. The FIT Lieutenant drafted a training plan that includes at least 180 hours (about 1 week) of training across the MPD and City enterprise. The draft training plan was developed for use in training civilian investigators, but sworn investigators have also attended some training. IAD has trained nine new civilian investigators (7 in IA; 2 for FIT) in the intake process and re-routed

62 cases from investigations to the expedited disposition process to begin working through their case backlog. All remaining unassigned IAD investigations have now been assigned. FIT reduced the Level 1 investigation backlog from 638 to 245, a reduction of 393 cases. The average age of intake cases has decreased to 19 days as of the most recent CCPO report (October 2024).

Given the resource and capacity constraints expressed by IAD and OPCR personnel, the City has moved forward on an RFP process to contract with qualified vendors to conduct use of force investigations and minor misconduct allegations. The external investigators for OPCR have been selected and began receiving cases late in the reporting period. The vendor for IAD is expected to be onboarded and begin work in early 2025.

Lastly, the City appointed Michelle Phillips as the Director of the Minneapolis Department of Civil Rights in July 2024. After her appointment, she prioritized assessing the organizational structure of OPCR and added an additional case manager position, bringing the total number of case managers to two, one assigned to intake and the other assigned to investigations. This organizational change is designed to help with the complaint and investigative flow, assigned tasks, and oversight and accountability to ensure timely completion of work and communications with complainants. The Director also added a department-wide Data Analyst to assist with timely updates to public dashboards and required monthly reporting. The Director continues to work with all stakeholders, OPCR staff and the IE team to reclassify positions in OPCR based on operational needs. The realignment of resources will assist OPCR with a structure that will yield a system that prioritizes the timely, effective and efficient completion of backlog cases in intake, and the timely assessment and completion of current cases. The new Civil Rights leadership is expected to present a new backlog plan during the next review period. The IE Team has been impressed with Director Phillips and her leadership thus far.

## Data Systems, Analysis, and Transparency (Part 11)

The City outlined its plan to replace its current case management system for police misconduct investigations, which was characterized as insufficient to meet the needs of MPD and OPCR. The vendor selected for EIS implementation provided an amendment to its contract to develop a replacement system for MPD and OPCR. The IE Team expressed concern about how this decision could impact compliance with paragraph 268, which requires system separation between IAD and EIS. MPD and the City are developing a plan to demonstrate compliance with paragraph 268, which is expected to include a change management and communication strategy to support EIS that makes this separation clear so that officers will trust that the system is not intended to serve as a disciplinary tool.

The Data Systems Assessment required under paragraph 361 was completed in May 2024 and transmitted to the IE Team for review. The IE Team's assessment of the review found the report to be Compliant with the Agreement's requirements. The City has developed a draft *Data Systems Plan* using the Data Systems Assessment as required by ¶361 and reported that it will submit a budget enhancement request to add additional staffing resources designed to implement the assessment's recommendations. The IE Team expects to

receive the *Data Systems Plan* during the next review period and will provide feedback as needed to ensure it contains sufficient detail to achieve compliance with Part 11 of the Agreement.

All groups that the IE Team met with demonstrated a willingness to implement Agreement requirement related to technology and data. All groups expressed an understanding that the goal of improving IT systems is to allow for MPD to become more transparent, more accountable, and provide better resources for supervisors to manage their personnel effectively.

The City has developed and currently has posted six dashboards which cover topics related to those outlined in Part 11: Use of Force Data, Officer Involved Shooting Data, Stop Data (which also contains Search and Citation Data), Arrest Data, OPCR Process Data, and MPD Disciplinary Data. Each dashboard has been reviewed by the IE Team. While the City and MPD have made a good first effort, each dashboard has one or more areas that still require significant enhancements to achieve minimal compliance with the Agreement. Deficiencies in how systems of record hold such data may currently be a limiting factor in presenting the data.

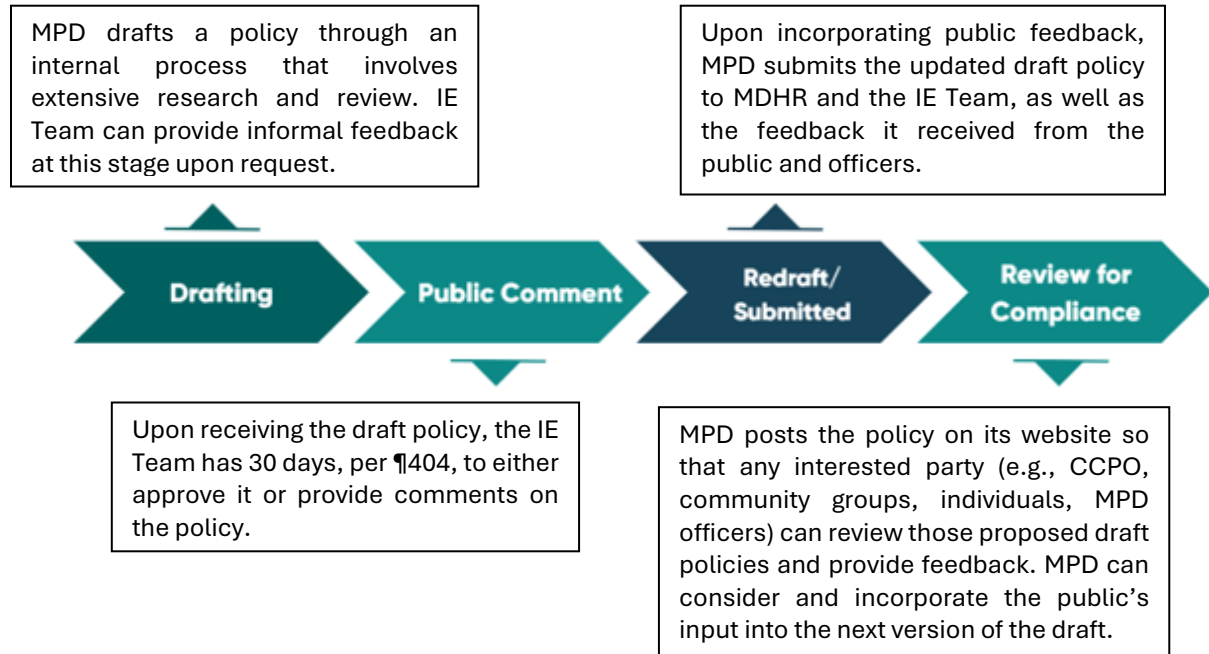
The Chief Information Officer of the City also indicated that there is to be a migration of these dashboards to the PowerBI platform (the current platform is Tableau). The IE Team will monitor this migration and report on progress as updates are received. City IT leadership is also eager to incorporate best practices and additional enhancements to a final series of dashboard products.

The City IT leadership team expressed concern that the command/rank structure of MPD can inhibit whether or how feedback from rank-and-file members can be received on IT projects that impact MPD and whether decisions that may impact requirements for IT solutions can be made timely so they do not impact implementation schedules. The IE Team offered to serve as a convening agent (when areas of the Agreement require it) to ensure that the proper level of feedback of the user experience is incorporated into the implementation phase for projects like EIS, UOF review, and other applications under development.

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

### IE Process for Policy and Training Reviews

The diagram below outlines the process for policy development and approval of the four core policy areas under the Agreement:



The IE Team assesses compliance for each draft policy by considering the following criteria:<sup>6</sup>

- **Compliance with the Agreement:** IE Team reviews to ensure that the policy includes the specific Agreement requirements on the topic, and that the language is consistent with those requirements.
- **Clear and Executable:** The IE Team reviews language to ensure it is as clear as possible for consistent interpretation by officers. The policy provisions must also be implementable.
- **Meaningfully Incorporating Public Feedback:** The IE Team reviews all public feedback received by MPD to confirm that it was considered by MPD and to understand how feedback was applied to the draft policy.
- **Alignment with Guiding Principles:** The IE Team reviews to ensure that the policy aligns with the guiding principles outlined in the Agreement.
- **Reflects Best Practices:** The IE Team reviews draft policies for consistency with generally accepted best practices. Generally accepted best practices are gleaned from model policies, national guidance and research, and professional knowledge and experience. The IE Team seeks to identify opportunities to incorporate best practices beyond the Agreement's requirements where possible and encourages the City/MPD to consider incorporating them.

<sup>6</sup> At our public meeting, the IE Team's Policy Lead, Lisa Fink, presented an overview of how the team reviews policies for compliance. A link to a video of that presentation can be found [here](#).



## IE Team Reviews of Updated Policies and Training

The IE Team provided feedback on formal policy suite submissions (per paragraph 404 of the Agreement) during the review period for the following topic areas:

- Use of Force
- Engaging with Minors
- Crisis Intervention

By the end of this review period (9/30/2024), MPD had not yet provided updated drafts of these policy submissions to incorporate feedback from MDHR or the IE Team.<sup>7</sup>

The IE Team provided informal feedback on draft policy submissions during the review period for the following topic areas:

- Adult Citations and Arrests
- Duty to Report
- Early Intervention System
- Internal Affairs Standard Operating Procedures (SOPs)
- Office of Police Conduct Review SOPs

The IE Team provided formal feedback on training submissions for the following topic areas:

- Crisis Intervention
- Engaging with Minors

As of the end of the review period (9/30/2024), MPD has not yet provided updated drafts of these training submissions to incorporate feedback from MDHR or the IE Team. These are expected to be provided and finalized before the end of the next review period.

The IE Team provided informal feedback on draft training submissions during the review period for Use of Force. In response to our feedback on the content, MPD agreed to reevaluate the preliminary Use of Force training documents and create a plan to address paragraphs and sub-section paragraphs from the Agreement regarding Use of Force that were not originally included in the preliminary training documents.

---

<sup>7</sup> However, these were subsequently submitted by MPD for review soon after the report period ended.

## IE Team Community Outreach Efforts

The IE Team has devoted substantial time and attention to becoming familiar with the City of Minneapolis and history, as well as getting to know the members of the Minneapolis community, both the public and the police. The IE Team has met with numerous community groups to include the following (in alphabetical order, not an exhaustive list):

- 21 Days of Peace
- A Mother's Love Initiative
- Communities United Against Police Brutality (CUAPB)
- Community Commission on Police Oversight (CCPO)
- Confederation of Somali Community
- League of Women Voters Minneapolis
- Metropolitan Urban Indian Directors
- Minneapolis for a Better Police Contract
- Minneapolis Urban Indian Directors (MUD)
- MN Justice Research Center
- NAACP Minneapolis
- North Minneapolis Jordan Area Community Council (JACC)
- Nuestra Lucha
- Plymouth Congregational Church – Reimagining Public Safety Group
- Quorum
- Somali Education and Social Advocacy
- Unity Community Mediation Team (UCMT)
- Voice of East African Women
- Young People's Task Force

These meetings provided not only insight into the concerns of the public but an appreciation for the impressive efforts they have made to promote improved policing services in Minneapolis and their efforts to support the MPD. The IE Team observed deep and constructive engagement by community groups on improving policing practices generally and policy development specifically.<sup>8</sup>

The IE Team has also posted on our website a community map, which identifies organizations involved in policing, their mission, and their connections to other Minneapolis organizations. The IE Team encourages interested organizations to submit their information for incorporation into the map, which can be viewed through the QR code here or through our [website](#).

The IE Team is also accepting applications to serve as our Community Engagement partner, whose role will be to help



---

<sup>8</sup> Although it occurred after the close of the reporting period, it is worth noting that the IE Team held two community meetings to report on IE Team efforts, how evaluation work is performed, and the City and MPD's progress toward implementation. These meetings were well attended. Attendees were engaged and asked thoughtful, informed questions concerning our work and implementation generally. A video of the November 14 meeting is available [here](#).

promote broad-based community engagement efforts in the implementation process, as reflected in both the letter and spirit of the Agreement. More information as well as the application to serve as our Community Engagement partner, can be found [here](#).

Finally, the IE Team is exploring the idea of forming an Implementation Liaison Council (ILC). As described previously in our Implementation Evaluation Plan, the role of the ILC would be to bring continuity and structure to the Agreement's community engagement objectives by forming a group of individuals that will commit to continued, long-term participation in the implementation process. ILC members would be charged with learning about the Agreement's requirements, how the IE Team evaluate MPD's practices, and assisting the IE Team in informing the Minneapolis public about the implementation and evaluation process. Individuals and organizational representatives interested in serving on the ILC are encouraged to apply by emailing [outreach@elefamn.org](mailto:outreach@elefamn.org) with the subject line "Applying for ILC membership." Questions about the community map, the local engagement partner, or the ILC can be submitted through our website at [www.elefamn.org](http://www.elefamn.org).

## IE Team Engagement of MPD Officers and City Staff

The IE Team met with various members of MPD's command staff, OPCR leadership and staff, and leaders from other City departments that will play a direct role in compliance efforts including from the Department of Civil Rights, IT Department, Property Services, and Emergency Communications. The IE Team has received a high degree of cooperation and commitment to implementation from all the individuals and groups with which it has met. The IE Team will continue to engage in a broad-based strategy with all City partners to support continued engagement in the implementation of the Agreement's requirements.

The members of the IE Team have also attended MPD officer roll calls and participated in ride-alongs to observe officers at work but also to hear their concerns and hopes for the Agreement implementation process:

- Officers were most critical of their working conditions, primarily the conditions of precinct stations and vehicles. Senior officers were more vocal than newer officers, although some acknowledged that they could see some progress being made to make improvements. A few officers complained that they were no longer able to "do their jobs" like before, but no one cited the Agreement as the reason. They were critical of recently updated policy restrictions; especially related to vehicle pursuits. Several of the complaints were made by senior officers while many of the newer officers were either silent or expressed approval of the new policy.
- Nearly everyone in all precincts expressed frustration with the disciplinary process and what they perceive as the inequitable application and handling of discipline.
- Many sworn members, mainly senior members, openly discussed their views that their elected officials do not support or appreciate them. This was a common theme in each visit to each of the precincts. Workforce shortage and officer safety were also common themes during each of the visits.
- Very few officers and supervisors had specific questions about the content of the Agreement.

### 3. Expected Progress for Next Reporting Period

#### Progress on Year 1 Implementation Goals

Below is the summary of the Year 1 Implementation Goals outlined by the IE in the Evaluation Plan:

<ul style="list-style-type: none"><li>• Substantial progress toward or complete elimination of the IA/OPCR backlog</li><li>• Increased ability to observe officer performance through BWCs and ICCs</li><li>• Completion of Equipment, Technology, and Facilities Response Plan</li><li>• Commencement of improvements to precinct facilities</li><li>• Launch of IE Team website (currently available at <a href="http://www.elefamn.org">www.elefamn.org</a>)</li><li>• Publication of Community Map</li><li>• IE Team public meetings and publication of Semi-Annual Reports</li><li>• Completion of Data Systems Plan</li><li>• Completion of first Annual Master Training Plan and Training Needs Assessment</li></ul>	
<b>Compliant Policies for:</b> <ul style="list-style-type: none"><li>• Mission, Vision, Values and Goals</li><li>• Non-discriminatory policing</li><li>• All use of force related policies</li><li>• All stops, searches, citations and arrest related policies</li><li>• BWC and ICC policies</li><li>• Internal Affairs &amp; OPCR Policies/Disciplinary Matrix</li><li>• Quarterly review panels</li><li>• Engaging with Minors</li><li>• Field Training Officers</li><li>• Officer Wellness &amp; Early Intervention</li></ul>	<b>Compliant Trainings for:</b> <ul style="list-style-type: none"><li>• Engaging with Minors</li><li>• Crisis Intervention refresher training</li><li>• Supervisor/Leadership Training</li></ul>

An itemized list on the status of each goal is provided below:

- Substantial progress toward or complete elimination of the IA/OPCR backlog
  - Status: **On-Track for Compliance in Year 1**
- Increased ability to observe officer performance through BWCs and ICCs
  - Status: **Not Yet Assessed**
- Completion of Equipment, Technology, and Facilities Response Plan
  - Status: **On-Track for Compliance in Year 1**
- Commencement of improvements to precinct facilities
  - Status: **Not Yet Assessed**
- Launch of IE Team website (currently available at [www.elefamn.org](http://www.elefamn.org))
  - Status: **Completed**
- Publication of Community Map
  - Status: **Completed**
- IE Team public meetings and publication of Semi-Annual Reports
  - Status: **On-Track for Compliance in Year 1**
- Completion of Data Systems Plan

- *Status: **On-Track for Compliance in Year 1***
- Completion of first Annual Master Training Plan and Training Needs Assessment
  - *Status: **Not Yet Assessed***
- Compliant Policies for:
  - Mission/Vision/Values/Goals: **On-Track for Compliance in Year 1**
  - Non-Discriminatory Policing: **Not Yet Assessed**
  - All Use of Force related policies: **On-Track for Compliance in Year 1**
  - All Stops/Searches/Citations/Arrest policies: **Not Yet Assessed**
  - BWC and ICC policies: **Not Yet Assessed**
  - Internal Affairs / OPCR Policies / Disciplinary Matrix: **Not Yet Assessed**
  - Quarterly Review Panels: **Not Yet Assessed**
  - Engaging with Minors: **Partially Compliant – On Track**
  - Field Training Officers: **Not Yet Assessed**
  - Officer Wellness: **Not Yet Assessed**
  - Early Intervention System: **Not Yet Assessed**
- Compliant Trainings for:
  - Engaging with Minors: **Partially Compliant – On Track**
  - Crisis Intervention refresher: **On-Track for Compliance in Year 1**
  - Supervisor/Leadership and Force Review Training: **Delayed – Expected to be Completed in Year 2**<sup>9</sup>

Several of the items listed as **Not Yet Assessed** are reported by MPD to be in various stages of progress. However, as of the end of the review period, the IE Team has been unable to assess them. The IE Team will continue to work closely with the MPD Implementation Unit to obtain regular updates on all action items related to the Year 1 Implementation Goals.

---

<sup>9</sup> As referenced in Section 1, Part 7 (Training) of this Progress Review, the supervisor/leadership training has been delayed till next year as the City of Minneapolis required an RFP for the training vendors to respond to before selection of a training vendor could be completed. Similarly, the force review training has been delayed due to the FIT focusing on higher priority tasks such as reducing the UoF review case backlog. The IE Team will continue to monitor this training issue, and the IE Team anticipates that it should be rescheduled at some point during the next reporting period.

## Anticipated Progress during the Next Reporting Period

In addition to the items listed in the Year 1 Implementation Goals, the IE Team projects the following activities (organized by subject area) to be completed during the next reporting period (10/1/2024 – 3/30/2025).

### Policy (Part 2)

- Submission of Mission/Vision/Values/Goals policies to IE Team and MDHR for formal submission, with public feedback incorporated.

### Non-Discriminatory Policing (Part 3)

- Posting of Non-Discriminatory Policing policies for public feedback, incorporation of public feedback into policies, and formal submission of draft policies to IE Team and MDHR with public feedback incorporated
- Compliance review for final policies

### Use of Force (Part 4)

- Compliance evaluation of final use of force policies.
- Compliance review for building the policy changes into training curriculum.
- Compliance review for training curriculum.

### Stops, Searches, Citations, Arrests (Part 5)

- Posting of Stops/Searches/Citations/Arrest policies for public feedback, incorporation of public feedback into policies, and formal submission of draft policies to IE Team and MDHR with public feedback incorporated.
- Compliance evaluation of final SCA policies before training commences.
- Compliance review for building the policy changes into training curriculum.
- Compliance review for training curriculum.

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

- Compliance review process for final policy changes.
- Compliance review of ticketing system for repairs and maintenance.

### Training (Part 7)

- Compliance review for Engaging with Minors policy changes that are built into training curriculum.

### Officer Support and Wellness (Part 8)

- City resubmission of Facilities, Equipment and Non-Database Technology Response Plan and subsequent review/feedback/finalization by IE Team and MDHR (¶248-250)
- Compliance review and building audits of completed objectives by the City (equipment, facilities, technology, databases) (¶246, ¶247, ¶361)
- Informal review/feedback of EIS draft policy and finalization of EIS Policy (¶268 – 288)
- Finalization of the Employee Support Plan (¶253-256)
- Finalized Contract and operational plan to provide all wellness services required under (¶253-262)

- IE Team review of telecommunicator Crisis Intervention training ¶237 (relevant to both training and crisis response sections)
- 40-hour Crisis Intervention Team training produced for review/feedback ¶236 (relevant to both training and crisis response sections)
- All training related to officer wellness, stress management, alcohol and substance abuse and support services for recruits and annual in-service produced to IT Team for informal review ¶240 (relevant to both training and crisis response sections)
- A plan for how written officer feedback will be achieved for the Annual Facilities, Equipment, and Non-Database Technology Response Plan and the Officer Health and Wellness Annual review ¶246, 267

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

- Baseline data produced for ¶290
- Clarification with MDHR regarding the scope of ¶289

### Accountability and Oversight (Part 10)

- IAD Backlog and OPCR Intake Backlog mainly cleared
- Updated and approved Coaching policy
- Assessment of external investigators quality of reports
- SOP of both IAD and OPCR completed and adopted
- Policies related to complaint and disciplinary procedures reviewed and approved
- Initial IE Team reviews of IAD and OPCR case files
- Implementation of new case management software for IA/OPCR

### Data Systems, Analysis, and Transparency (Part 11)

- City submission of Data Systems Plan and subsequent review/feedback by ELEFA (¶361 – 363)

## 4. Status of Compliance with Settlement Agreement Requirements

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, the IE Team defines the various status of compliance for each paragraph of the Agreement using the following scale from the Evaluation Plan:

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



The IE Team’s process for compliance assessment has only just begun, and therefore a significant majority of paragraphs remain in the status of “Not yet measured,” given there are a host of preliminary steps and action items that must be completed before a compliance determination can be made. Because the City and MPD completed some actions prior to the start of the IE Team’s evaluation efforts, there are several provisions that are “Compliant” or “Partially Compliant On-Track.” These paragraphs are outlined below (listed by Part and Paragraph number):

Part	Compliant	Partially Compliant – On Track
Part 2 (Policy)		
Part 3 (NDP)		
Part 4 (UOF)		
Part 5 (SSCA)		
Part 6 (BWC)		172, 173, 178
Part 7 (Training)		235, 236
Part 8 (Wellness)	254, 255	246, 247, 248, 256
Part 9 (Mental Health)		
Part 10 (Accountability)		
Part 11 (Data)	361, 362	363

Paragraphs listed as **Partially Compliant – On Track** in Part 6 are related to the requirement that MPD maintains a BWC program and provides sufficient BWC equipment to officers (¶172-173) as well as developing a system to track repairs and replacement of broken BWC and ICC equipment (¶178). The IE Team must make additional inspections of equipment availability and review the updated BWC policy upon completion before these can be considered Compliant.

Paragraphs 246, 247, and 248 have been rated as **Partially Compliant – On Track**. These are related to assessments of the department’s equipment and non-database technology (¶246), and the department’s facilities (¶247) as well as the development of the Equipment, Technology and Facilities Response Plan (¶248). The City contracted with two vendors to complete the assessments required by ¶246 and ¶247. The IE Team has reviewed these assessments, and each has been determined to be sufficient in detail and rigor to develop Plans going forward. These paragraphs (¶246 & ¶247) also require periodic reassessment of equipment needs and annual reassessment of facility needs. They also require MPD feedback during each assessment (and reassessment). For these reasons, the IE Team rates these paragraphs as Partially Compliant – On Track until future reassessments can be adequately completed and provided for compliance review.

Paragraphs 254, 254, 361, and 362 are listed as **Compliant** in Part 8 and Part 11. These are related to the completion of the needs assessment for the Employee Support Plan (¶254, ¶255), and the Data Systems assessment (¶361, ¶362). These were one-time, external assessments from qualified vendors contracted with the City to complete requirements under the Agreement. The IE Team has reviewed these assessments, and each has been determined to be sufficient in detail and rigor to develop Plans going forward. Plans related to these assessments are under development, and the IE Team reviewed drafts of each. As

a result of these reviews, the IE Team is currently rating the Plan requirements as **Partially Compliant – On Track** (§256, §363), given that each plan still required additional content (as of 9/30/2024) before they can be considered Compliant under the Agreement.

All other paragraphs<sup>10</sup> not listed with a status above are considered **“Not yet measured.”** In future Progress Review reports, this chart will be appended to include additional paragraphs as they come into compliance with the requirements under the Agreement.

---

<sup>10</sup> Note: paragraphs that are listed as “Guiding Principles” throughout the Settlement Agreement do not receive compliance ratings given the requirement they are treated as non-enforceable under paragraph 7 of the Agreement.

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

The nature of the collaborative work between the Parties and the IE team often straddles the line between evaluation and technical assistance. For example, as reported above the IE Team has provided extensive advice and guidance during the policy drafting process that was not specifically provided for in the Agreement. Nevertheless, the following list identifies assistance that the IE Team categorizes as technical assistance that was provided during the Review Period:

- In September 2024, the IE Team organized several group meetings that included stakeholders from various sections within MPD and City departments outside of MPD (such as OPCR, Information Technology, Property Services, and Emergency Communication) that are mutually responsible (along with MPD) for coordination or completion of efforts related to the Agreement's requirements. The goal of these meetings was to ensure that various personnel were made aware of the anticipated Year 1 and Year 2 milestones set forth in the Evaluation Plan and to determine if there are any substantial obstacles or challenges that may inhibit the MPD and/or the City from achieving these milestones. The IE Team observed that MPD and City stakeholders appeared engaged and showed a good level of understanding of the work necessary to achieve compliance.
- The IE Team aided IAD and OPCR in the development of their updated SOPs, to include information on how to prioritize low level cases using an expedited resolution process.
- The IE Team made direct observations of the Crisis Intervention refresher training and provided feedback and assistance on how to improve the training in the future.
- The IE Team participated in monthly check-in meetings hosted by the City IT department to provide status on the implementation of EIS and other data systems that are also being implemented by the EIS vendor (vehicle pursuits, use of force review, internal affairs case management, OPCR case management). During these meetings, the IE Team frequently provides technical advice regarding effective strategies for large scale implementation of IT projects for law enforcement agencies.
- During its assessment of compliance for the Facilities, Equipment, and Non-Database Technology Response Plan, the IE Team provided technical assistance in developing and defining the framework and structure of the Plan to ensure that it could satisfy the requirement of the Agreement.
- The IE Team met several times with the IT Department to give guidance on implementing effective coordination strategies between IT and MPD and developing quality data dashboards compliant with the Agreement.
- The IE Team provided direct assistance and guidance to the Chief of Police and the MPD Implementation Unit Commander on an ongoing basis to ensure that MPD is using effective change management strategies to positively impact departmental compliance efforts.
- The IE Team provided technical assistance to the Training Division on how to develop a Training Needs Assessment (TNA) and incorporate it into the Annual Training Plan (ATP).
- The IE Team provided technical assistance on developing more professional Scenario-Based-Training (SBT) exercises. The IE team provided feedback on their current SBT exercises and recommended changes to the format and to focus on using the Critical Decision Model (CDM) to debrief the exercises.



January 30, 2025

David Douglass  
Independent Evaluator  
Effective Law Enforcement for All

Via Electronic Communication

Dear David Douglass,

The Minnesota Department of Human Rights (MDHR) appreciates the progress noted in this first Independent Evaluator Progress Review Report for the period of March 18, 2024, to September 30, 2024. **Under the state's court enforceable consent decree, the City and MPD have begun to make foundational changes.** MDHR is actively enforcing the terms of the consent decree, and these changes are being overseen and supported by your highly qualified team, Effective Law Enforcement for All.

MDHR is laser-focused on nothing less than the transformational change necessary for the City and MPD to **address the findings of race discrimination** in violation of the Minnesota Human Rights Act. The state consent decree requires the City and MPD to develop a culture of continuous learning based on humanity and civil rights. This foundation is essential for creating and enforcing clear policies, training on those policies, and providing community members and officers with transparent assessments of enforcement practices and outcomes.

MDHR approaches its work of enforcing the consent decree with thoughtful urgency and, in consultation with its policing practice experts, MDHR provides robust feedback to the City and MPD on policies, trainings, and plans as they are developed. MDHR reviews each submission to ensure feedback from community members and police officers has been considered, where such feedback is required by the consent decree.

MDHR understands that changing culture and developing foundational systems takes time. The work the City and MPD are doing is not easy. It will not happen quickly. And the changes must be done correctly.

MDHR looks forward to the work ahead with the City, MPD, community members, and Effective Law Enforcement for All to address race-based policing and strengthen public safety.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca Lucero'.

Rebecca Lucero  
Commissioner  
Minnesota Department of Human Rights