



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 'RL', with a stylized, flowing script.

Rebecca Lucero
Commissioner
Minnesota Department of Human Rights