Effective Law Enforcement for ALL

INDEPENDENT EVALUATOR PROGRESS REVIEW REPORT

MINNEAPOLIS POLICE DEPARTMENT & THE CITY OF MINNEAPOLIS

REVIEW PERIOD
October 1, 2025 – March 31, 2026

outreach@elefamn.org
www.elefamn.org

Contents

Executive Summary **2**
Progress Made by the City and MPD Under the Evaluation Plan **4**
Achievements 4
Challenges 5
Recommendations 6
Year 1 and Year 2 Implementation Status **8**
Year 1 Management Goals 8
Year 1 Training Development and Delivery Goals 9
Year 2 Management Goals 9
1. Progress Made by the City and MPD Under the Evaluation Plan **11**
Policy-Related Activities (Part 2) 11
Non-Discriminatory Policing (Part 3) 13
Use of Force (Part 4) 14
Stops, Searches, Citations, and Arrests Related Activities (Part 5) 15
Body Worn and In-Car Cameras (Part 6) 15
Training-Related Activities (Part 7) 16
Officer Support and Wellness and Early Intervention (Part 8) 18
Mental and Behavioral Health Crisis Support in the Field (Part 9) 21
Accountability and Oversight (Part 10) 22
Data Systems, Analysis, and Transparency (Part 11) 26
2. Description of Work Conducted by the IE Team During the Review Period **27**
Policy Review and Approval 27
Community Outreach Efforts 28
Engagement with MPD Personnel and City Staff 29
Audits and Compliance-Related Reviews 29
Technical Assistance Provided by the IE Team During the Review Period 30
Year 3 and 4 Evaluation Plan 30
3. Expected Progress for Next Review Period **31**
4. Status of Compliance with Settlement Agreement Requirements **33**
Conclusion **34**
Appendix **35**
Links to Prior Progress Reviews 35
Defined Terms for Compliance Status and Goals 35
Defined Terms for Compliance Status 36
Glossary of Acronyms and Terms 36

Executive Summary

The City's progress toward implementing the Settlement Agreement (SA or the Agreement) during this Review Period, October 1, 2025 through March 31, 2026, was decidedly mixed. On the positive side, for example, the MPD completed in-service training on updated use of force policies, and those policies became active on January 1, 2026. This is one of the four core topic areas of the Agreement, and implementing new use of force policy is a consequential accomplishment. The Health and Wellness and Introduction to EIS annual in-service training was also completed. These are meaningful steps toward supporting officers' health and wellness. Other important policies were approved in this period, as reported in the body of this report.

On the negative side, however, significant delays in critical Agreement requirements persist. Our last Progress Report expressed our serious concern about the Department's lack of progress reducing its Internal Affairs (IA) case backlog. Since then, no meaningful progress has been made. A functioning IA unit that investigates and adjudicates complaints in a timely fashion is not only a core Agreement requirement but a foundational element of a culture of fairness and accountability. MPD's continued inability to timely investigate and adjudicate complaints is unfair to the complainants and MPD's sworn personnel. Complaints that remain open for months, and even years, become a proverbial Sword of Damocles, hanging over the officer's head, that prevents their advancement and undermines their morale and the morale of fellow officers. The failure to timely resolve complaints defeats the purpose of a progressive, corrective action disciplinary system. The lack of progress is even more concerning because MPD leadership has long been aware of these deficiencies. The Department has provided us with its plan to address the problems, but it contains no deadlines for the individual steps needed to accomplish its goal; eliminating the backlog by December 2026. Thus, while it is a step in the right direction, there is currently no basis to assess whether it will be the necessary remedy.

Progress toward implementing an Early Intervention System (EIS) has also stalled due to management weaknesses and personnel turnover. The EIS is an important officer support tool. It flags indicators of potential problems, allowing supervisors to intervene before they lead to serious health issues or misconduct. The delay in implementing this system also heightens officers' apprehensions about how the system will be used and how it will affect them. MPD is beginning to reengage the process. They have posted the Director of Health and Wellness position who, once hired, will oversee the hiring of the two new EIS personnel who left their positions during this Review Period. The Health and Wellness Unit is working on the EIS Supervisor training as well as the development of an SOP to administer the system and a user manual for supervisors, which will be integrated into the training.

Policy and training curricula development continues at an uneven pace. Progress continues, but the City has not achieved many of the goals it set for itself for years one and two of the implementation process, as reflected in our Evaluation Plan (available here).[1] The MPD has applied lessons learned, and the Parties have worked to streamline the review and approval process. For these reasons, we are optimistic that the pace of policy and training development will improve going forward.

[1] https://ele4a.org/wp-content/uploads/2024/09/20240912-407-P12-Implementation-Progress-Evaluation-Plan-Final-ELEFA-EJM.pdf

In the body of our report, we offer recommendations that we believe would help the City and MPD address the shortcomings we have found, strengthen its processes prospectively, and enhance their ability to meet their goals for years three and four. They are:

- Reassess personnel capacity, roles, and responsibilities.
- Establish clear supervisory authority, responsibility, and reporting.
- Supplement existing communication and coordination channels.
- Ensure that all personnel responsible for Agreement implementation understand how their role and responsibilities relate to Agreement implementation.
- Set and communicate aggressive but realistic deadlines.
- Establish standing meeting times to ensure availability of necessary personnel.
- Keep department personnel informed.

Collectively, these recommendations reflect that implementation must be a higher priority in the coming years than it has been for the last two years. We recognize that the MPD must meet many competing demands, but other cities have demonstrated that implementing reform agreements need not detract from those obligations. On the contrary, it can support them. Other cities have come into compliance under consent decrees while reducing crime, increasing public safety, and building community trust. MPD has the ability to do the same. It is just a matter of commitment.

As we have said in prior reports, institutional transformation is a complex, uncertain, and lengthy process. This is true, even under the best circumstances, but work in this Review Period did not occur in that environment. Far from it. The federal Metro Surge enforcement initiative painfully disrupted life in Minneapolis for more than two months, and the City and MPD are still recovering. We heard first-hand accounts of the harm that Metro Surge inflicted and saw how Minneapolitans supported each other during this unprecedented, and unwelcome, federal action. City and MPD personnel normally tasked with implementing the Agreement were appropriately drawn away, working long hours, over many days, to address the City's needs during this time. It was a severe, unanticipated disruption of the implementation process.

Overall, these first two years implementing the Agreement under our watch have presented the City and MPD with challenges and demands it had not previously experienced. Their personnel have demonstrated genuine and sustained commitment to implementing the Agreement despite these challenges. Lessons have been learned that they continue to apply to expedite and improve implementation. We are working with the City and MPD, as is MDHR, to streamline processes and strengthen project management. Transformational change occurs incrementally, and the City and its police department are making continued, if uneven, progress toward that goal.

We appreciate and commend the many City and MPD personnel, sworn and non-sworn, who are working diligently to advance implementation. We are grateful for the continued engagement of our MDHR colleagues and the Minneapolis community, whose participation and feedback remain essential to successfully and sustainably achieving the Agreement's goals.

Progress Made by the City and MPD Under the Evaluation Plan

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

Achievements

- **Policy Approvals.** The following policies were approved during this Review Period:
  - Misconduct and Accountability Policies, P&P 2-100s, April 6, 2026)[2]
  - Searches for Voluntary Transports, P&P 9-111 (approved March 30, 2026)
  - Adult Stops, Searches, and Seizures & Citations, P&P 9-100, and Adult Citations and Arrests, P&P 9-200 (approved March 6, 2026)
  - Early Intervention System (EIS) policy, P&P 2-203 (approved January 2, 2026)
  - Quarterly Review Panel (QRP) policy, P&P 2-601 (approved January 2, 2026)
  - Use of Force policies: post-training technical updates to policies 3-201, 5-301, 5-302, 5-303 through 5-314, 7-801, 7-802, and 7-804 (approved November 2025)
  - Peer Support, P&P 3-503 (approved November 6, 2025)
- **Use of Force Training.** MPD delivered the three-day Use of Force in-service training for its sworn members. Completion of the training is a prerequisite for implementing the policies, which occurred on January 1st of this year. MPD has submitted its attendance records for our review.
- **Health and Wellness Training Delivered.** MPD launched the Health and Wellness and Introduction to EIS annual in-service training for 2025. The training incorporates holistic wellness concepts, best-practice inclusive language, and an introduction to the EIS.
- **2026 CIT Refresher Training Approved.** Following extensive collaboration with MPD, its vendor, and MDHR over the prior six months, we approved the 2026 MPD 8-Hour CIT Refresher Training Course in January 2026. This represents a substantial improvement over prior iterations, including the incorporation of a law enforcement co-facilitator. The IE observed this training and found it to be well done.
- **Peer Support Team Deployment.** With the Peer Support Policy approved, MPD continued to operationalize the Peer Support Team, including deploying it in response to traumatic incidents. An additional 7 Peer Support members were vetted during this Review Period, bringing the total to 27. All precincts (except for Precinct 1) have assigned Peer Support members. The Peer Support Team provides support to all MPD operations and now has a dedicated sergeant. The team meets for two hours monthly to offer professional development, consultation, and team-building exercises. They are also tracking utilization of services, but with no personal identifying information to protect confidentiality.

[2] While this policy chapter was technically approved after the Review Period, we are including it in this report since the last few days' delay were minimal, and significant efforts were made to complete these policies during this Review Period.

- **Director of Wellness Position Funded.** The City posted the position and is presently interviewing candidates.
- **QRP Meetings Continued.** MPD conducted Quarterly Review Panel meetings covering traffic stops and their use of force topics. We observed continued but uneven improvement in the quality and self-critical nature of the discussions.
- **CCPO.** The CCPO has recruited new members, including alternates who can replace standing members, when necessary, which prevents delays in staff reviews. It also invited former Chief O'Hara to appear before it, which he did.

Beyond these specific achievements, the City continues to improve its implementation processes and strengthen its collaboration with us and with MDHR. These efforts have accelerated progress, which we expect will continue as those process improvements are built upon going forward.

Challenges

- **Policy and Training Development.** This process is inherently slow and cumbersome, as drafting clear, concise, yet comprehensive policies can be complex, and entails review and approval by several distinct groups, including internal subject matter experts, officers, MPD and City leadership, the City Attorney's Office, the public, MDHR, and ELEFA. MPD has worked with us and MDHR to identify and eliminate inefficiencies. We are optimistic that, going forward, the process will move faster.
- **IA Backlog Reduction.** Despite working on this for at least two years, MPD has made no meaningful progress in reducing its case backlog. Bottlenecks in key stages of the misconduct investigation process, combined with continued turnover, lack of experienced investigators, and internal conflict, are among the factors that have stalled progress.
- **Insufficient Staffing for Wellness Unit.** Despite the funding of the Director of Wellness position, the Health and Wellness Unit remained understaffed relative to the requirements of the Agreement. Positions recommended in the Employee Support Plan have not yet been fully allocated or hired. Additionally, the MPD lost its EIS Manager and EIS Coordinators in this Review Period, causing significant delays in the scheduled roll-out of EIS. MPD will be reorganizing EIS functions under the Wellness Unit and will have it, reporting directly to the Chief upon hiring of a Director of Wellness. We consider this to be a positive structural realignment.
- **Data System Deployment Delays.** The new case management system for IA/OPCR, originally projected for June 2025, was further delayed to a pilot date in June 2026. EIS Phase 1 development continued, though the deployment timeline has been extended too, given recent vacancies that have occurred in key positions needed to support the EIS.
- **FTO Program SOP Remains Incomplete.** The Field Training Officer Program SOP, which has been a persistent concern across multiple Review Periods, remained unfinalized at the close of this Review Period. The absence of an approved SOP continues to delay the implementation of an Agreement-compliant FTO program and the development of related policies and training.

Recommendations

Based on our work with MPD over the past two years and what we have observed, we offer the following recommendations for manageable steps the City and MPD could take to build on their strengths and offset some of their weaknesses.

- **Reassess personnel capacity, roles, and responsibilities.** In this report, as in prior ones, we have commended the skill, dedication, and commitment of the individuals tasked with implementing the Agreement. Nevertheless, we have also observed a lack of coordination between the several groups that must work together to implement the Agreement's interconnected requirements. Additionally, there has been personnel turnover, revised responsibilities, and other unforeseen developments, one consequence of which is to cause some people to be overworked. Thus, as implementation moves into years three and four, we recommend that the City and MPD reassess whether personnel are being utilized efficiently and effectively.
- **Establish clear supervisory authority, responsibility, and reporting.** Implementation depends upon a number of different groups to work together, including for example, MPD's Implementation Unit (which is a creation of the Agreement), the City Attorney's Office, which has its own Implementation Unit, the IT department, the facilities department, OPCR, and sworn MPD personnel who provide subject matter expertise. We understand that the MPD leads a weekly ReformStat meeting that pulls together many of these groups. Yet, we continue to observe that some individuals lack an appreciation of how their work relates to other implementation tasks or how others depend on their work to meet their implementation responsibilities. It also appears to us that some individuals who have implementation responsibilities do not understand how their work relates to the Agreement overall. While we have established cross-functional meetings, there is a limit to the depth of our involvement. Thus, we recommend that the City evaluate its management structures and ensure clear lines of authority, responsibility, and reporting.
- **Supplement existing communication and coordination channels**. Although ReformStat establishes coordination at the leadership level, there appears to be a need for small, cross-functional, groups to meet regularly to share information, coordinate tasks, and set realistic deadlines, at the task level.
- **Ensure that all personnel responsible for Agreement implementation understand how their role and responsibilities relate to Agreement implementation.** As explained in the preceding recommendation, we have observed that some individuals with responsibilities for implementation do not appreciate how their work relates to implementation overall. We recommend that the City and MPD take steps to ensure that all individuals involved in implementation understand how their work fits into implementation plans and schedules.
- **Set and communicate aggressive but realistic deadlines.** Some personnel devote all or the majority of their time to implementation. For others, however, implementation is just one of many competing demands. Sometimes, their implementation tasks arise only

sporadically. Implementation must be a priority but one that must align with the reality of competing demands and limited time employees have. It is unfair and counterproductive to set deadlines that do not respect the many tasks City and MPD employees must juggle. Failure to do so, disrupts plans, delays implementation, and increases costs. Thus, while implementation must remain a priority, tasks and deadlines must be assigned and set in alignment with competing demands.

- **Establish standing meeting times to ensure availability of necessary personnel.** Given competing demands, scheduling meetings on an ad hoc basis is challenging and leads to delays and lack of preparation. While ad hoc meetings are occasionally necessary, it is preferable and more efficient to set regular, standing meetings. This enables participants to plan around them and be prepared. The meetings need not necessarily be long. They should be tailored to the meeting's purpose, i.e., is it a check-in meeting or a working meeting (setting the meeting default time at 30 minutes rather than one hour can promote efficiency).
- **Keep department personnel informed.** Based on discussions with many MPD members, it is clear that many know little about the Agreement, and they report hearing little from the Department concerning the Agreement, its implementation and how it will affect them. It is essential that the Department communicate to its members its vision for the Department and how the Agreement will support that vision. MPD members are understandably apprehensive about how the Agreement will affect them. Clearer policies, quality training based on adult-learning principles, improved facilities and technology, and more support for officer wellness are some of the changes that will directly benefit officers. An equally important benefit will be increased trust by the public. The Department should communicate these benefits as part of its vision to better serve its members.

Year 1 and Year 2 Implementation Status.

The tables below reflect the status of Year 1 and Year 2 implementation goals as of the close of the Review Period on March 31, 2026. Many Year 1 goals have been completed, while several policy and training goals across both years remain in progress. Year 2 goals increasingly reflect the shift from planning to execution and accountability.

Year 1 Management Goals

Status	Management Goal / Topic Area
Completed	MPD/City Completion of Data Systems Plan
Completed	MPD Completion of first Annual Master Training Plan and Training Needs Assessment
Completed	MPD/City Completion of Equipment, Technology, and Facilities Response Plan and commencement of initial improvements to precinct facilities
Completed[3]	MPD increased its ability to observe officer performance using BWCs and ICCs
Off-track	MPD/OPCR makes substantial progress toward or complete elimination of the IA/OPCR backlog
IE Team Goals	
Completed	IE Team launch of website (www.elefamn.org)
Completed	IE Team publication of Community Map
Completed	IE Team regular public meetings and publication of Semi-Annual Reports

Year 1 Policy Revision Goals

Note: Three items were added to this list in prior reviews: "Training Policies" (a component of the FTO Program goal), "Peer Support" (a component of the Officer Health, Wellness & Safety goal), and "Warrants" (to differentiate progress relative to other SSCA topics).

Status	Policy Revision Goal / Topic Area
IE Approved	Mission/Vision/Values & Goals
IE Approved	Use of Force
IE Approved	Non-Discriminatory Policing
IE Approved	Body Worn Cameras / In-Car Cameras
IE Approved	Officer Health, Wellness & Safety
IE Approved	SOPs on Internal Affairs and OPCR Procedures

[3] While additional BWC Audit SOPs to fully cover the scope of officer activity remain to be developed, the IE Team assessment of this goal is considered to have been Completed with the finalization of policy and the anticipated deployment of updated BWC training during the next review period.

IE Approved	Peer Support Policy
IE Approved	Early Intervention System Policy (2-203)
IE Approved	Quarterly Review Panel Policy (2-601)
IE Approved	Stops, Searches, Citations, and Arrests (9-100s & 9-200s)
IE Approved	Misconduct and Accountability Policies (2-100s)
Off-Track / In Progress	Warrants (9-300s)
Off-Track / In Progress	Field Training Officer Program SOP
Off-Track / In Progress	Training Policies (2-500s)
Off-Track / In Progress	Corrective Action Matrix[4]
Postponed	Engaging with Minors (pending completion of SSCA policies)

Year 1 Training Development and Delivery Goals

Status	Training Development and Delivery Goal / Topic Area
IE Approved	Use of Force (delivered department-wide)
IE Approved	Supervisor Leadership
IE Approved	Crisis Intervention Refresher Training (2026 iteration approved January 2026)
Off-Track / In Progress	Crisis Intervention (MECC 8-hour; delivery pending approval of revised submission)
Postponed	Engaging with Minors

Year 2 Management Goals

Status	Management Goal / Topic Area
On-Track / In Progress	MPD improvements to public-facing data dashboards
On-Track	MPD/City continued implementation of Equipment, Technology, and Facilities Response Plan
Off-Track / In Progress	MPD/City continued implementation of Database Systems Plan
Off-Track / In Progress	Updated Use of Force Reporting Module
Off-Track / At-Risk	Updated IA/OPCR Misconduct Case Management System (pilot deployment further delayed to June 2026)
Off-Track / At-Risk	Implementation of EIS Phase 1 (deployment paused pending change management; development on schedule)
Off-Track / At-Risk	MPD/City continued implementation of the Employee Support Plan (staffing levels remain below plan requirements)

[4] Previously referred to as the Disciplinary Matrix in prior ELEFA reports.

IE Team Goals	
Off-Track / In progress	IE Team completion of annual community evaluation survey and officer survey
Completed	IE Team public meetings and publication of Semi-Annual Reports

Year 2 Policy Revision Goals

Status	Policy Revision Goal / Topic Area
IE Approved	Crisis Intervention
Off-Track / In Progress	Critical Incidents Policy
Off-Track / In Progress	Supervisor Duties / Responsibilities Policy
Off-Track / In Progress	Performance Evaluations Policy
Off-Track / In Progress	Social Media Use in Investigations Policy

Year 2 Training Development and Delivery Goals

Status	Training Development and Delivery Goal / Topic Area
IE Approved	Use of Force (department-wide delivery substantially complete)
IE Approved	Officer Health and Wellness and Introduction to EIS (approved for delivery; observation)
IE Approved	Crisis Intervention Refresher (2026 iteration; delivery to commence)
IE Approved	Supervisor Leadership
Off-Track / In Progress	Body Worn Cameras and In-Car Cameras
Off-Track / In Progress	SSCA and Non-Discriminatory Policing training (curriculum development pending policy approval)
Off-Track / In Progress	Crisis Intervention for MECC 911 call-takers and dispatchers (further revisions required)
Off-Track / In Progress	Crisis Intervention 40-hour course for recruits (under continued review)
Off-Track / In Progress	Early Intervention System training (supervisor-specific training under development)
Off-Track / Not yet started	Supervisory Duties/Responsibilities training
Off-Track/ Not Yet Started	IA/OPCR Misconduct Investigative Procedures training (vendor selection in process)
Off-Track / Not Yet Started	Performance Evaluations training
Off-Track / Not Yet Started	Corrective Action Matrix training
Off-Track / Not Yet Started	Critical Incidents training

1. Progress Made by the City and MPD Under the Evaluation Plan

Policy-Related Activities (Part 2)

Policies Approved During the Review Period

As of March 31, 2026, MPD and the City completed and received our approval on the following policies and documents (listed in order of approval):

- Peer Support, P&P 3-503, (approved November 6, 2025 -- after the prior Review Period, but prior to the publication of the 3rd Progress Review)
- Use of Force policy post-training technical updates (policies 3-201, 5-301, 5-302, 5-303
- through 5-314, 7-801, 7-802, and 7-804; approved November 2025)
- Early Intervention System, P&P 2-203, (approved January 2, 2026)
- Quarterly Review Panel, P&P 2-601, (approved January 2, 2026)
- Stops, Searches, Citations, and Arrests, P&P 9-100s and 9-200s, (approved March 6, 2026)
- Searches for Voluntary Transports, P&P 9-111, (approved March 30, 2026)
- Misconduct and Accountability, P&P 2-100 (approved April 6, 2026)

Approval of SSCA policy chapters 9-100 and 9-200, which span a broad range of topics from voluntary contacts through arrest procedures, completes an over year-long collaborative drafting effort and enables MPD to move forward with SSCA training development. It is also a core policy topic under the Settlement Agreement, reflecting its importance to the Agreement's overall goals and to the Minneapolis community. In other words, it is an important accomplishment.

Approval of the Misconduct and Accountability policies likewise represent a significant milestone in the Department's work under the Agreement to enshrine duty to report, duty to intervene, misconduct complaint receipt processes, and explanation of investigations into police misconduct into policy.

Approval of the Early Intervention System (EIS) policy is a foundational step toward implementing an effective EIS that reinforces a culture of continuous improvement and proactive officer support throughout MPD. MPD will need to develop additional standard operating procedures for administering this system and a user guide for supervisors to support consistent and effective EIS system use. Similarly, the approval of the QRP policy allows MPD to direct its energy toward robust implementation of meaningful Quarterly Review Panel meetings, which are essential to MPD's development as a self-assessing, self-correcting agency. Lastly, the approval of a Peer Support policy is a notable achievement to establish expectations for how the Peer Support Team will serve its role in supporting peer members and inform all MPD members of the Peer Support Team's existence and purpose.

During MPD's department-wide Use of Force in-service training, members identified certain policy language they considered unclear. MPD considered this feedback and proposed clarifying

technical revisions, which we and MDHR reviewed. We approved these updated policies during this Review Period.

Policies and SOPs Still in Progress

We continued active collaboration with the Parties on the following policies and SOPs during this Review Period:

- **Warrants, 9-300s.** Workshopping continued on the Warrants policies. Additional revisions were needed at the close of the Review Period.
- **Field Training Officer Program SOP.** We continued to provide technical assistance to MPD on this SOP. Progress was slower than anticipated, and ELEFA has expressed concern about the pace of work on this SOP. The absence of an approved SOP continues to delay implementation of an Agreement-compliant FTO program and the completion of related training policies.
- **Training Policies, 2-500s**. These policies are linked to the FTO SOP and await its completion before MPD can finalize them.
- **Corrective Action Matrix.** We and MDHR provided feedback on the draft that we received, and we are planning workshopping discussions for the beginning of the upcoming Review Period.
- **Critical Incident Policy and Crisis Communication Plan.** The City reports that MPD and the Office of Community Safety continued to develop the critical incident response policy and the City's Crisis Communication Plan.
- **Limitation on Hours Worked,3-310.** During this Review Period, we workshopped this policy with the Parties to work through several discussion points. On March 31. 2026, the City submitted this policy for approval.
- **Supervisory Duties.** MPD submitted this for a technical assistance review on March 26, and we were actively reviewing it at the end of the period.
- **Social Media Use in Investigations**. We provided technical assistance during this Review Period. MPD updated the policy based on our feedback and posted it for public comment in February, and MPD submitted it to ELEFA and MDHR for workshopping on March 31.
- **Performance Evaluations.** All work was internal to MPD during this period. As the system of record for performance evaluations is developed, policy drafts will also incorporate system requirements that members must meet to complete evaluation tasks.
- **Engaging with Minors.** MPD was actively working on updates during this period while SSCA was being finalized.
- **Foot Pursuit, 7-806.** Technical assistance from ELEFA occurred during this Review Period. On March 31, MPD sent it to ELEFA and MDHR for workshopping.
- **BWC Audit SOPs.** During this Review Period, ELEFA and MDHR provided comments on these SOPs. MPD submitted these SOPs for approval on March 23, 2026 (and after the

end of the Review Period, MDHR and we raised some issues that need to be resolved before approving).

- **Force Option - High-Pressure Air (HPA) Projectiles and Launchers (Pepper Balls),** 5-315. During this Review Period, ELEFA provided technical assistance on this policy, and then MPD posted it for public feedback.

Draft Policies Posted for Public Feedback

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

- 12/30/25: MPD posted Searches for Voluntary Transports for 45 days;
- 2/2/26: MPD posted Social Media Use in Investigations for 45 days;
- 3/23/26: MPD posted High Pressure Air Projectiles (Pepperball) UOF policy for 45 days
- 12/4/25 and before that: Police Authority in Immigration Matters was posted for public comment (not SA policy)

As described in prior Progress Reviews, Paragraph 28 of the Agreement requires only those policies identified as core policies to be publicly posted for 45 days. MPD, to its credit, has voluntarily agreed to post non-core policies for 30 days to receive public feedback.

Policy Management Software Launched

MPD launched the Policy and Resource Hub, its new policy management software, coinciding with the activation of the UOF policies. The system provides MPD members and the public with a user-friendly interface to access and search for MPD policies, including dynamic glossary definitions and links to related policies, statutes, and ordinances. MPD continues to work on small tweaks to ensure that the system is operating effectively. We view this as a meaningful operational improvement that should help members better understand and apply the policies for which they will now be held accountable. The policy hub can be accessed through the department's website at: https://mpdpolicyhub.minneapolismn.gov/

Policy and SOP Development Efficiency and Capacity

Apparent bottlenecks in the policy development process continued during this Review Period. The Corrective Action Matrix and the FTO SOP are two examples of documents that experienced delays in MPD's internal review processes, which extended the anticipated timelines for these important policies. We continue to observe that too few staff are responsible for too many simultaneous policy assignments, and we suspect that some delays are due to internal inefficiencies, including requiring many people to be available for internal discussions regarding policy edits. We reiterate our encouragement for MPD leadership to continue monitoring and improving internal turnaround processes, and to allocate additional drafting resources where needed to meet the remaining Year 2 and Year 3 policy goals.

Non-Discriminatory Policing (Part 3)

Non-Discriminatory Policing, P&P 5-104, and Procedural Justice and Professional Policing, P&P 5-109, were approved in the prior Review Period. The focus during this Review Period shifted to

development of the NDP training curriculum. MPD hired a vendor to develop a 32-hour training covering Non-Discriminatory Policing and Stops, Searches, Arrests and Citations (including content on Disorderly Conduct and Obstruction of a Legal Process). Work on the Expanded Course Outline and lesson plans advanced, though delivery of this training is not expected to commence until Year 3. The approval of the SSCA policies (9-100s and 9-200s) during this Review Period establishes the policy foundation for Engaging with Minors policy revisions, which MPD will now be positioned to resume.

Part 3 of the Agreement also requires the implementation of a performance evaluation policy and system. The City has selected a vendor to develop and maintain this requirement, and at the appropriate time, we will evaluate the system configuration to determine whether it meets the requirements of the Agreement.

Use of Force (Part 4)

Use of Force In-Service Training Completion

MPD substantially completed delivery of the three-day Use of Force in-service training across the department during this Review Period. The training, which we observed and approved its instruction delivery, covered updated UOF policy provisions (Day 1), Minnesota POST psychomotor skills-based requirements including introduction of the Taser 10 (Day 2), and scenario-based exercises including deadly force and duty to intervene using the Critical Decision-Making Model (Day 3). MPD reported that make-up training for members who did not complete the training during the initial delivery cycle was completed by December 2025.

After the training was delivered, we requested MPD to provide sufficient documentation to verify that the training was delivered to all members required to receive it. Fulfilling that request required the department to reconcile records across multiple systems, including scanned sign-in sheets, which took several months to collect, verify, and input into the training record system.

Our initial review of the data received on March 31, 2026, identified gaps in the department's tracking and verification of member attendance at required trainings. We will complete this review and work with MPD on its training data processes during the next Review Period.

Complete training records are essential for verifying that all active personnel have been trained. Our goal will be to work with MPD to ensure the department is better positioned to accurately track and report on all members required to complete training in real time. This issue is not limited to use of force training; establishing reliable tracking systems is a prerequisite to compliance across Part 7 and required by paragraph 195.

The revised UOF policies went into effect on January 1, 2026. Members are now expected to know and be held accountable to them in the ordinary course of their operating duties and can be held accountable to them through the misconduct investigation process.

Force Investigation Team (FIT)

MPD has provided a description of their approach to FIT during this reporting period. MPD continues reviewing and assessing an appropriate FIT model. MPD has also determined that it lacks the staffing capacity and the foundational policies, procedures, and training necessary to sustain effective FIT operations. MPD is studying FIT's organizational structure and staffing needs

to allow the unit to be successful. We will monitor the scope and findings of that study and report progress in the next Review Period.

These comments from MPD reflect the longstanding concerns we have documented across prior Progress Reviews. As of the previous Review Period, FIT had made progress reducing the backlog of reviewing Level 2 uses of force cases but continued to express concern about its capacity to keep pace with anticipated caseload growth once the new UOF policies went into effect. Those concerns have proven well-founded: the new policies reclassify takedowns and neck touches from Level 1 to Level 2, appropriately but significantly increasing the volume of cases requiring FIT review. Addressing that volume sustainably will require dedicated personnel with clear assignments, adequate training, and governing policies and SOPs that have not yet been developed.

Supervisor Force Review Training

We provided technical assistance to MPD in developing its 8-hour Supervisor Force Review training class during this Review Period. After we and MDHR provided feedback, MPD reformatted the lesson plans and learning activities to align with the recently approved UOF training documents. We anticipate approving this training and observing its delivery during the next Review Period.

Critical Incident Policy

The Critical Incident Policy and the City's Crisis Communication Plan remained under development at the close of the Review Period. The City has advised us that it is substantially overhauling these documents, which it will then submit to us.

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

The approval of Policies 9-100 and 9-200 on March 6, 2026 represents a significant achievement. These two policy chapters cover 24 policies spanning the full range of officer-public encounters from voluntary contacts through adult arrest procedures, including supervisory review of SSCAs, strip searches, and transportation of detained persons. Achieving approval required extensive review, editing, and discussion across more than a year of collaboration.

With the 9-100s and 9-200s approved, MPD is now positioned to develop training curricula for SSCA and the related Non-Discriminatory Policing and Disorderly Conduct training, which will be combined into a single course. The Warrants policies (9-300s) required additional work, and workshopping continued at the close of the Review Period. The upcoming SSCA training under development does not cover the Warrants content.

As 9-100s and 9-200s were finalized and the Warrants policies are nearing completion, MPD has been working internally on updating the Engaging with Minors policies, which were paused pending completion of the SSCA framework.

Body Worn and In-Car Cameras (Part 6)

MPD has had body-worn cameras in operation for nearly a decade. The Agreement’s requirements in Part 6 build on that preexisting foundation. Camera video is a cornerstone of how we and MPD will evaluate officer performance and whether the Agreement’s reforms are changing officer behavior. It is one of the most direct tools available to observe whether cultural change is

taking place.

The updated BWC and ICC policies were approved in the prior Review Period. During this Review Period, MPD submitted its BWC Audit SOPs for review in March. Those SOPs are currently under review; we will have more to say about them in the next Progress Review. We are working with MPD to ensure that audit methodologies can fully capture activity across the department and not only in patrol operations, as current processes are primarily focused on patrol.

During the Review Period, MPD also collaborated with us and MDHR in developing an online training module to inform officers on the updates to BWC and ICC policies. The module incorporates adult learning principles and scenario-based learning, and its online delivery format allows it to be distributed to members without requiring in-person academy attendance. We look forward to completing our review and anticipate approving this training for delivery to officers during the next Review Period.

During the Review Period, we also completed a baseline audit of the sufficiency of the in-car camera ticketing and repair log system. MPD was able to demonstrate a basic functioning ticketing system for tracking ICC repairs and maintenance and that such repairs are readily made within 30 days of reporting an outage. However, MPD's system has room for improvement. It does not work as effectively as it should given they are not using codes correctly and instead are relying only on the narrative box. While they have a good first start, using the appropriate codes is an important next step to ensuring items can be quickly evaluated for triage and tracked for progress. Now that the policy is approved and the recordkeeping system for ICCs is functioning, the remaining requirement is delivery of the training module regarding ICC usage, followed by our audit process, which will ultimately determine compliance.

Training-Related Activities (Part 7)

2026 Training Needs Assessment and Annual Training Plan

We reviewed and commented on MPD's 2026 Training Needs Assessment (TNA) and Annual Training Plan (ATP). Both documents followed the format agreed upon during the prior year. The TNA process included a nationwide law enforcement trends analysis, ten stakeholder interview sessions, and a priority ranking of training objectives. The ATP identified how MPD would develop and deliver high-priority training consistent with Agreement requirements and Minnesota POST requirements. MPD received Chief of Police approval for the 2026 TNA and ATP.

Professional Advisory Committee for Training

The Professional Advisory Committee (PAC) for Training continued to meet quarterly during this Review Period. PAC members, which include local university professors, state training experts, and mental health professionals, continued to provide feedback on training curricula and to teach at the pre-service Academy. We anticipate that the PAC will prove to be an increasingly valuable asset as MPD develops more complex and integrated training programs in the coming year.

Use of Force Training Delivery

See the Use of Force section above for a full description of training delivery. We observed delivery of the three-day UOF training across multiple sessions during the Review Period. MPD is in the process of providing documentation to demonstrate all active members completed the required

training. This documentation will also include feedback from class participants on how to improve future training and we will determine a compliance assessment on whether MPD has sufficiently completed UOF training requirements during the next review period.

Supervisor Force Review Training

We provided technical assistance to MPD in developing the 8-hour Supervisor Force Review training class. Based on feedback received from us and MDHR, MPD reformatted the lesson plans and learning activities to align with the recently approved UOF training documents. We anticipate approving this training and observing its delivery during the next Review Period.

Crisis Intervention Training

We approved the 2026 MPD 8-Hour CIT Refresher Training Course on January 16, 2026. This training represents a substantial improvement over prior iterations, and we commend MPD and its vendor for the collaborative work undertaken over the prior six months to achieve that result. We also commend the incorporation of a law enforcement co-facilitator, the lack of which in prior versions of the training had been one of our concerns. We observed delivery of the training during this Review Period and found it to be well organized and well received, with strong participant engagement. The scenario-based exercises were particularly effective. The training satisfies the requirements of Paragraph 236, and we have assessed it as Partially Compliant, On Track. We will provide written feedback on the 2026 delivery to inform the development of the 2027 version, and we expect that future iterations will continue to improve content consistent with adult learning principles, including through the use of new lived-experience videos, updated scenarios, and consideration of Problem-Based Learning facilitated exercises.

The 40-hour CIT training for new recruits has been stalled during this Review Period. We have observed substantial portions of this training in prior periods but have not reviewed it for compliance as there are substantial portions yet to be updated. Of the portions of the training that the IE observed, the training incorporates a law enforcement co-lead, people with lived experience, and excellent scenario-based exercises. The MPD and its vendor decided to shift their focus to necessary revisions to the 2026 Annual CIT Refresher for all officers and the development of the MECC CIT training. The IE understood the decision to shift focus, but this training should be prioritized for completion during the next Review Period.

We were unable to approve the MECC Crisis Intervention Training for compliance as submitted during this Review Period. ELEFA did agree that foundational training for MECC could be delivered in 2026, and that the 4-hour refresher training will undergo a compliance review prior to its delivery early next year. While the submission showed notable improvements over prior versions, including stronger content on dispatcher listening skills, de-escalation, and less-stigmatizing language, further revisions are required before we can approve it. Specifically, the lesson plan requires updated person-first language throughout, the scenarios require clarification, the presentation must include slides addressing the Event Protocol requirements of Paragraph 237 (covering when calls do not necessitate a police response and instead require crisis services such as the Behavioral Crisis Response Team), and lacked pre- and post-test instruments to test knowledge gained through training. We directed MECC to revise the training and resubmit it for approval. We also reiterate our recommendation that MECC consider having a dispatcher serve as co-facilitator for this training, consistent with the practice MPD has adopted for the law

enforcement CIT refresher course.

Health and Wellness and Introduction to EIS Training

MPD completed the Health and Wellness and Introduction to EIS annual in-service training in November 2025, following our approval on November 14, 2025, under Paragraph 266(g). We commend MPD for developing and delivering training that integrates holistic wellness concepts, best-practice inclusive language, and an introduction to the EIS in a format that is respectful and minimizes stigma.

The training was approved, as it satisfied the requirements of Paragraph 266(g). We provided additional guidance during this period clarifying that the training satisfies the annual in-service portion of Paragraph 266(e), though full compliance with that paragraph also requires providing support services information during annual UOF training and during academy training for new recruits. Supervisor-specific training addressing Paragraph 266(f), related to strategies for communicating with employees about support services in a manner that minimizes stigma, remains under development by MPD in collaboration with the EIS vendor.

Misconduct Investigation Training Development

MPD and OPCR issued an RFP for training development for misconduct investigations. During this Review Period, MPD and OPCR selected a vendor. Developing this training program will be an important step towards overcoming the problems created by a lack of trained personnel.

Field Training Officer Program

The FTO Program SOP remained unfinished at the close of this Review Period, despite continued technical assistance from us. We participated in workshopping sessions and provided extensive feedback on the SOP. The delay in finalizing this SOP continues to prevent MPD from implementing a compliant FTO program and finalizing the related training policies (2-500s).

When compared to other observed SOP development processes, there appears to be a gap in the technical writing capacity for this document. Thus far, the drafts MPD has provided have lacked the necessary detail to meet the SA requirements and to provide sufficient guidelines and instruction to govern the FTO Program, and to ensure consistent implementation of the program over time. Whatever the cause of the delay, it is clear that MPD needs to empower a project leader with the ability to make key decisions to move this process forward. We continue to monitor this matter closely and will provide technical assistance as requested.

Officer Support and Wellness and Early Intervention (Part 8)

The MPD Health and Wellness Unit provided monthly updates on its progress toward achieving the Agreement's goals and requirements. MPD Health and Wellness staffing levels were maintained during this Review Period, with three dedicated personnel (2 sworn and 1 civilian), The EIS unit, however, lost both full-time personnel, which significantly set back progress toward implementing the EIS. We remain concerned that the unit's staffing is insufficient for an agency of MPD's size and the significant amount of work the Agreement requires. At the end of this Review Period, however, MPD identified funding for and posted the Director of Wellness position, which is a crucial position. We are encouraged by this. It will be important to backfill any vacant positions. The goal remains for the City to fund all positions recommended in the Employee

Support Plan, as required by ¶256. The City has cited budgetary restrictions as the reason for the stalled hiring. The Agreement makes clear, however, the City's obligation to provide resources sufficient to implement its requirements. We have strongly encouraged the City, verbally and in writing, and again through this report, to provide the resources necessary to fulfill the Agreement's requirements, and to demonstrate the City's commitment to the health and wellness of MPD members.

The current personnel assigned to the Health and Wellness Unit, however, are a highly productive, smart, capable team, who are dedicated to furthering the mission of prioritizing health and wellness for MPD members. Our monthly meetings are effective and well organized, with MPD coming prepared to show continued progress. We have some concerns about whether these personnel are receiving sufficient support and guidance, especially considering the 100% turnover in the EIS unit during this Review Period.

A new, full-time Peer Support lead was onboarded during this Review Period, also a crucial role. When considering new members of the unit, MPD should ensure they are the right fit, understand the mission of officer wellness, and promote a collaborative work environment.

EIS Deployment

In January 2026, we approved the EIS Policy, P&P 2-203, with the caveat that the policy may require adjustment following the pilot deployment phase to reflect operational realities, particularly given the supervisory turnaround timelines it prescribes. MPD has begun to develop supervisory training for EIS and advance to the pilot phase of EIS implementation, once the vacant EIS positions that will support its deployment are filled. All related materials, including the administrative SOP and user guides will also need to be consistent with the Agreement's requirements.

EIS deployment remained paused at the close of the Review Period, and the timeline for pilot phase launch has not been confirmed. Two key personnel responsible for leading EIS implementation departed from the Department during this Review Period, leaving MPD without dedicated management for this program. MPD has responded by restructuring the EIS program: EIS will report to the Director of Wellness, who will in turn report directly to the Chief of Police.

This proposed organizational alignment is consistent with good practice and reflects the appropriate positioning of EIS within the officer wellness framework. The Department plans to fill the Director of Wellness position first, followed by the EIS Administrator, and EIS Coordinator, with the Director of Wellness involved in those selections. Once these positions are filled, progress toward EIS implementation is expected to gain momentum again.

Peer Support Policy and Program

With the Peer Support Policy approved, MPD moved forward with formalizing the program's operations. Onboarding of the Peer Support Team lead was a priority during this period, as was finalization of the clinical lead vendor contract. The Peer Support Team continued to be deployed in response to traumatic incidents. During this Review Period the Peer Support team responded to multiple traumatic incidents that also made national headlines, including the shootings of Renee Goode and Alex Pretti by ICE personnel. MPD reported that since from January – March of 2026 there were a collective 660 member contacts with the Peer Support team. We commend the

members of the Peer Support Team for their dedication and the professionalism with which they have supported their colleagues. MPD posted an internal announcement to recruit additional members for the Peer Support team and has added 7 additional qualified officers. The Cordico wellness application, which provides mental health resources and peer support contact information to MPD members, was launched during this Review Period.

Staffing of the Health and Wellness Unit

The Director of Wellness position was funded during this Review Period, which is a positive development that was strongly supported by ELEFA. However, the position had not yet been filled at the close of the Review Period. While advancements have occurred with the unit, this Review Period also saw the loss of two key personnel. We continue to be concerned that the Health and Wellness Unit as a whole remains understaffed relative to both the requirements of the Employee Support Plan and the demands of an agency of MPD's size. MPD identified between 3 and 4 officer positions, administrative analyst position, and additional staff support positions in the Employee Support Plan, but these positions have not yet been funded or hired. These positions must be prioritized if the City and MPD are to meet its obligations under the Plan.

Facilities, Equipment, and Non-Database Technology Plan

The City continued to implement the approved Facilities, Equipment, and Non-Database Technology Plan. The executive steering committee, which we observe monthly, continued to meet. The original assessment identified 319 projects of varying complexity. Based on documentation submitted to us for review and site visits, we have approved 123 items as completed as of the end of the Review Period. Projects vary significantly in complexity and cost, and many of the higher-complexity items remain in process, but the rate of completion on lower-complexity items reflects effective coordination among the participating entities.

Water quality issues identified in the Settlement Agreement persisted as a concern this Review Period. To the City's credit, water testing sites have been identified, with 239 locations identified amongst MPD-occupied spaces. The City expects to move to the bid process in the next Review Period. Results are expected to be available during the next Review Period, at which time we will report findings.

The 2026 internal facility assessment is expected to be completed during Q3 and Q4 of 2026. The 1st precinct has moved into its new facility, with the vacated building being renovated for additional training space and a temporary Health and Wellness Unit space. The City is currently seeking funding for a new Community Safety Training and Wellness Center with dedicated space for emergency service wellness and training, whose functions have been lacking sufficient space and appropriate facilities. While the funding has not yet been approved for the new space, we urge the City to keep this a priority. Additionally, the City has given approval for relocation to a new 3rd precinct building.

The monthly standing meetings between Property Services, MPD building leadership and the designated person from the City's Implementation Unit continue to be productive, giving voice to each MPD to identify any facility issues, concerns, or needs, for Property Services to respond to. This has been an important advancement that began in year one and continues to be successful.

The precinct cot rooms, while improved since the onset of the SA, continue to expose

maintenance issues. Nearly every site visit conducted by our team reveals an absence of bedsheets, and stained mattress pads and pillows. On our most recent site visit, Precinct 2 cot rooms had no trash cans, with trash lying on the floor, no sheets, dirty wool blankets and stained mattress pads and pillows. Officers reported they are required to bring their own sheets. We appreciate the challenges that maintaining cot rooms presents, but we urge the City to consider ways to address these problems. Cot rooms are important, especially when officers are required to work overtime and may have little time to rest between shifts.

Complaints of rodents in the Grain Exchange building have been addressed by Property Services, but there continue to be concerns about clean water, with many people buying their own water. Water testing sites have been identified, with 239 water source locations calculated amongst MPD-occupied spaces. The project will be moving forward for bids/requests in the next Review Period.

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

Mental and Behavioral Health Support had some key improvements during this Review Period. A dedicated MPD CIT Coordinator was selected, who assisted with co-leading the annual CIT Refresher training, a significant accomplishment. Minneapolis Emergency Communication Center (MECC-911 center) through its vendor, Minnesota CIT, developed and delivered a new 8-hour Crisis Intervention training. While the training was not produced for compliance since the MECC has not yet developed required policies, MPD decided to deliver the training since the MECC had never received mental health training. Additionally, we met with the City to discuss the anticipated release of the next RFP for the required behavioral crisis response (BCR) program. In the next Review Period, we anticipate that the MPD Crisis Intervention Policy and the MECC policies related to mental health will be revised or developed, respectively.

Crisis Intervention Training

We approved the 2026 CIT Refresher Training in January 2026. In connection with that approval, however, we encouraged MPD to continue to develop and expand inclusion of adult learning principles and to expand officer skills and empathy. We also encouraged MPD to consider transitioning to Problem-Based Learning in the 2027 version.

We observed substantial portions of the 40-hour CIT training for new recruits, which incorporates a law enforcement co-lead, people with lived experience, and excellent scenario-based exercises. We provided written feedback, and MPD and its vendor were working to incorporate revisions prior to the next delivery. However, the MPD and its vendor determined the need to shift their focus to completing the 2026 8-hour annual CIT Refresher training and the new MECC CIT training. While we understood this decision, the review process of the 40-hour CIT training for recruits should be prioritized in the next Review Period.

MPD CIT Coordinator

During the previous Review Period, MPD committed to assigning a full-time MPD CIT Coordinator, and earlier this year, a full-time sworn position was assigned to fill this critical role. A sworn member also served as the co-lead for the 2026 CIT Refresher training, which was an important enhancement to the training. We continue to view the assignment of a dedicated, full-time CIT Coordinator as important to the credibility and effectiveness of MPD's crisis intervention

training and response program.

Behavioral Crisis Response

The City, the Minneapolis Fire Department (which now provides oversight of the Behavioral Crisis Response (BCR) program), and MECC continued to work on improving data collection and analysis related to BCR call diversion, availability, and workload impact. Our team met with MECC to provide technical assistance on management of BCR data practices. A BCR data dashboard was under development during this Review Period, and the City anticipates scheduling a demonstration of the dashboard's capabilities for us during the next Review Period.

We met with the Commissioner of Community Safety and City stakeholders on Behavioral Health Crisis Response and continue to look forward to updated data and plans demonstrating that the BCR program can meet the requirements of Paragraph 289 -- specifically, that it is responsive 24 hours a day, 7 days a week, 365 days a year and that it is adequately resourced.

MECC dispatch protocols for crisis-related calls continued to require attention. We noted that current protocols need to be updated to sufficiently meet Settlement Agreement requirements. Updated protocols should be a priority for MECC during the next Review Period.

Limitation on Hours Worked

As described in the Policy section above, MPD submitted its final version of the Limitation on Hours Worked policy. We are optimistic that approval will occur in the next Review Period.[5]

The Hours Worked policy was revised during this Review Period through a constructive collaborative process among the Parties. At the end of this Review Period, the Parties and ELEFA were engaged in some final discussions to resolve open issues to ensure the policy was ready for approval. We also encouraged MPD to update its data systems to improve managerial analysis and controls and visibility over hours worked, particularly given that members continue to routinely exceed the Agreement's limits under current conditions.

Accountability and Oversight (Part 10)

During this Review Period, we continued to observe IA Intake meetings, OPCR Intake meetings, and Review Panels, and monitor progress on backlog reduction, case management system development, and completion of the Misconduct and Accountability policies. ELEFA also finalized a review of all historical backlog cases from IA and OPCR which resulted in a recommendation of coaching. We have devoted significant attention to this topic. While there has been progress, it is also this area in which we have the greatest concerns, especially regarding the Internal Affairs Bureau’s processes and inability to eliminate its case backlog.[6]

ELEFA also reviewed all cases from IA and OPCR which resulted in a recommendation of coaching for the period April 2019 to September 2023 for OPCR cases, and September 2018 to April 2024. The purpose of this review was to establish a baseline against which to measure future progress. These have been described as Historical Backlog Cases. ELEFA produced a report

[5] This policy was approved after the reporting period but prior to the issuance of this report.
[6] Historical backlog refers to those cases that were delinquent when we commenced our work. Complaints received after the but are not resolved within the Agreement’s 180-day timeline are considered non-compliant but are not counted in the historical backlog. Eliminating the backlog does not, without more, address non-compliant cases.

which was then given to the Parties for feedback. ELEFA gave the Parties its draft of the coaching review report at the end of this Review Period and allowed the Parties 30 days to review and comment, prior to publication. That feedback was received on or about April 30th. We are currently reviewing that feedback and will issue the report after we have completed our review, without waiting for the next Progress Report.

Misconduct and Accountability Policies

A significant amount of work was done by MPD and the City to finalize policy chapter 2-100, covering topics of duty to report, duty to intervene, procedures for accepting misconduct complaints, and summarizing the expectations for police misconduct complaints. The Parties worked down to the wire to complete these policies at the end of the Review Period. Ultimately, we approved these policies on April 6, 2026, just a few days after the Review Period ended.

Internal Affairs Bureau

In the three years since the Agreement was signed, including two years under our oversight, MPD has failed to make meaningful progress toward fixing the problems identified in MDHR's investigation. The problems we have documented across prior Progress Reviews, including leadership instability, insufficient staffing, structural conflict between IA and FIT command, an inability to move cases through the supervisory review stage, and lack of progress eliminating the historical backlog, persisted or worsened. Significant resources must be directed toward IA if MPD is to build the accountability system the Agreement requires. Without a functioning IA, the goal of timely corrective action, the consistent application of standards, and the trust that comes from prompt accountability cannot be achieved. The persistent failure to investigate IA complaints in a timely manner undermines public trust and is unfair to officers. The purpose of a progressive discipline system is to identify and sanction policy violations in a timely manner so that the officer can account for and learn from their errors. Delayed investigations are also unfair to officers because they render officers ineligible for promotion while under investigation. Thus, an officer who is ultimately exonerated will have been penalized by missing promotion opportunities.

The most significant operational bottleneck is supervisory reviews. With only one functioning civilian supervisor available to actively move cases through the review process, cases have accumulated at that phase with no viable path to clearance at the current resource level. The Senior Project Manager is also absorbing the duties of a vacant Case Manager role on top of their own responsibilities. IA also reports that it currently lacks dedicated intake supervision, investigator career ladder positions, a policy and research coordination function, and a data analyst. In previous reports, we have seen the value in these roles related to addressing the historical backlog across City agencies. Until these gaps are filled, the supervisory bottleneck will continue to define the bureau's capacity. The combined effect of these conditions is that IA has not made meaningful progress on its historical backlog during this Review Period.

Concerning, too, is the state of the Chief's Review process at the end of an investigation. The Agreement contemplates that the Chief will issue a determination within 30 days of receiving a case. Available data on cases indicates that the actual average is more than four times that figure, and that cases currently sitting with the Chief have been pending longer than those already decided. These delays, at the final stage of a process that is already significantly delayed at virtually every stage, undermine the accountability system's core purpose. Timely corrective

action is essential to changing behavior. A finding of misconduct issued months or years after the fact does not accomplish that goal.

A significant weakness in the Chief's review process is the lack of structural independence and efficiency in the post-panel review stage. IA personnel who were involved in the investigation are also responsible for drafting the Chief's memo and participating in disciplinary decision-making on the back end, particularly for both IA and OPCR cases. The lack of independent review at the Chief's review phase omits an important check on the investigative findings. It allows investigative findings to carry through multiple stages of accountability review rather than introducing a fresh, objective assessment after panel review.

Further delays occur because IA supervisory staff are splitting responsibilities between active investigations and Chief's memo preparation, contributing to the bureau's inability to clear its backlog. In addition, the Chief's review process was described as inconsistent and difficult to move efficiently, with requested edits or deviations from established disciplinary frameworks often requiring additional labor and employment attorney review before matters could proceed.

By the end of March, there were indications that some improvements had begun, including better prioritization of meetings and movement on backlog reduction. However, we remain concerned with the overall structure of the process, particularly the absence of a clearly independent review function between investigative units and final disciplinary decision-making. These concerns were sufficiently significant that OPCR identified the issue as a barrier to fully resolving its historical backlog, and CCPO formally requested a review of the effectiveness and timeliness of the Chief's process.

At our request, in March 2026, IA provided a memorandum documenting the issues that have plagued the bureau and outlining a path forward. The memo confirmed the scale of turnover we have previously reported, acknowledged the structural gaps that have produced operational bottlenecks, and identified needed corrective steps including role-specific recruitment postings, a formal internal application process for sworn assignments, and an independent external assessment of IA's organizational structure and staffing model.

MPD reports that it has taken steps to stabilize operations during this Review Period. According to MPD, IA instituted bureau-wide accountability meetings in late February 2026 to improve supervisory consistency and case tracking, strengthened the process for advancing cases to the Chief's Office through structured bi-weekly reviews, and developed an RFP for additional external investigative assistance. IA also reported it has a goal to complete all historical backlog cases through the administrative investigation phase and supervisory review phase by the end of 2026 but made clear that this end of year target is contingent on receiving additional staffing resources and external support. We found the memo to be a candid and useful accounting of the bureau's problems, which have existed for years. But to be meaningful, i.e., operational rather than merely aspirational, the plan should include deadlines, to which the MPD can hold itself accountable. We will monitor closely and report MPD's execution of its plan.

Office of Police Conduct Review

OPCR continues to reduce its backlog. It reports that it has completed supervisory review of all historical backlog cases during this Review Period, with the single exception of one case in which

the involved officer remains on leave until June 2026. It anticipates eliminating the historical backlog by summer 2026. OPCR reports that over the past six months, the average duration of its administrative investigations remained consistently under 180 days, which would meet Settlement Agreement timelines requirements. Average intake processing time for 2026 cases fell to 10 days, compared to 126.7 days (about 4 months) for 2025 cases. We will continue to monitor its performance.

OPCR review panels experienced some operational challenges early in the Review Period. MPD overtime restrictions initially limited sworn panelist availability until MPD leadership confirmed in late February 2026 that panel participation qualifies for overtime. Operation Metro Surge also affected the availability of several civilian panelists during January and February.

OPCR took steps to broaden participation and strengthen outreach. As a result, panel operations have improved. In December 2025, OPCR published a Review Panel Recommendations Report analyzing trends in policy violation recommendations and disciplinary outcomes, and they plan to publish a supplemental report on the Chief's final disciplinary decisions relative to panel recommendations. This level of public reporting is consistent with the Agreement's transparency objectives.

OPCR continued to make progress on the Benchmark case management system in collaboration with MPD and City IT, and the City executed a contract with a training vendor to develop and deliver misconduct investigation training on the approved SOP, with training expected to begin in late 2026.

Community Commission on Police Oversight

We continued to observe CCPO meetings, Review Panels, and training sessions during this period. OPCR's support of CCPO operations continued to be assessed as Partially Compliant, On Track until the entire section on CCPO requirements can be reviewed for compliance. We will conduct our own survey of CCPO Commissioners during the next Review Period to provide an independent assessment of whether OPCR's support is sufficient to allow the CCPO to meet its obligations under the Agreement. OPCR reports that the approved recruitment strategy has been deployed. CCPO has been able to add trained alternate members, which has allowed it to staff Review Panels when a member is unable to attend.

CCPO has also engaged in oversight during this Review Period, including inviting former Chief O'Hara to answer questions related to MPD’s Immigration policy implementation during Operation Metro Surge.

Misconduct Case Management System

Delays in implementing the IA/OPCR Case Management system have been extensive. The IA/OPCR case management system, originally projected to enter a pilot phase in February 2025 and later revised to June 2025, was further delayed to a pilot deployment date at the end of March 2026, and has recently been delayed again to June 2026. Following intervention by City IT and MPD leadership, the vendor added staff and MPD personnel refocused its attention to the project. IA and OPCR personnel continued to spend considerable time with the vendor's project team, providing requirements for the system's configuration.

We will continue to participate in status meetings and will assess whether the system, once deployed, meets the Agreement's requirements for effective case tracking and data management.

Data Systems, Analysis, and Transparency (Part 11)

QRP Policy Approved

The Quarterly Review Panel, policy 2-601, was approved on January 2, 2026. MPD is now positioned to focus its energy on the robust implementation of QRP meetings. The QRP process is one of the Agreement's key mechanisms for MPD to develop into a self-assessing, self-correcting organization.

Quarterly Review Panel Meetings

MPD conducted Quarterly Review Panel meetings during this Review Period, including a March session on traffic stops that we observed. We saw continued improvement in the depth and self-critical character of the discussions. We note, however, that MPD still lacks the data systems necessary to provide the robust statistical analysis of patterns and trends that the Agreement contemplates. This limitation will remain until the data systems described in the Data Systems Plan are fully operational.

Data Systems Plan Implementation

The City continued to implement its Data Systems Plan. Several key items experienced delays or require updated status assessments:

- The IA/OPCR case management system, originally projected to enter a pilot phase in February 2025, has experienced multiple delays in deployment. As of the close of this Review Period, pilot deployment is now targeted for June 2026. A recent demonstration of the system (held after the end of the Review Period) indicated that the system may not yet be ready for a pilot phase in June.
- While EIS Phase 1 system development has been largely on track, deployment has been paused due to the change in management and staffing issues described in the previous section (Part 8). City IT is developing a roadmap for the multi-phase deployment and coordinating with MPD on the schedule of milestones that ensures vacant support positions for EIS are hired prior to the pilot phase or phase 1 deployment commences.
- The Policy Management System was launched in connection with the activation of the UOF policies, providing MPD members and the public with a searchable interface for accessing MPD policies.
- A draft version of an updated public facing Use of Force Dashboard was demonstrated to the IE Team in late March 2026 and received positive feedback for its transparency and user accessibility.
- The City launched an RMS Leadership Workgroup and released a Request for Information for Records Management System solutions, receiving responses from eight vendors currently under review.
- A staff augmentation RFP for data presentation and interim solutions capacity closed in February 2026, with vendor selection underway.

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

Policy Review and Approval

This section includes the status of each policy or group of policies worked on during the Review Period, which ended March 31, 2026.

Policies and SOPs Approved During the Review Period

- **Peer Support, 3-503.** We reviewed and approved this policy in early November 2025, after the prior Review Period's close but prior to publication of the 3rd Progress Review. We recognize this as an important step toward compliance with Paragraph 253.
- **Use of Force Post-Training Technical Updates.** We reviewed and approved the technical revisions to the UOF policies – P&P 3-201, 5-301, 5-302, 5-303 through 5-314, 7-801, 7-802, and 7-804 -- in November 2025.
- **Early Intervention System, 2-203.** After extensive review over multiple drafts and workshopping sessions, we approved this policy on January 2, 2026. The policy addresses the requirements of Paragraphs 268 through 284 of the Agreement.
- **Quarterly Review Panel, 2-601.** After multiple rounds of workshopping and feedback, including a final submission on December 31, 2025, we approved this policy on January 2, 2026. The policy addresses Paragraphs 368 through 374.
- **Stops, Searches, Citations, and Arrests, 9-100s and 9-200s.** We approved these policy chapters on March 6, 2026, after significant collaboration that began in November 2024 and extended for well over a year.
- **Searches for Voluntary Transports, 9-111**. While technically part of the 9-100s chapter, this policy was submitted and developed separately. After reviews and collaborative discussion with MPD, we approved this policy on March 30, 2026.
- **Misconduct and Accountability Policies, 2-100s.** We conducted an in-depth review of these policies during the Review Period, participating in multiple workshopping sessions and collaborative discussions. At the end of the Review Period, there were some issues being sorted out amongst the stakeholders, but these were resolved merely days after the Review Period, and thus we were able to approve these policies on April 6, 2026.

Policies and SOPs Under Development

- **Warrants, 9-300s.** We continued workshopping the Warrants policies during this period. Additional revisions were required at the close of the Review Period.
- **Field Training Officer Program SOP.** We continued to provide technical assistance

to MPD on this SOP. We participated in workshopping sessions and provided detailed feedback. Progress remained slower than expected.

- **Training Policies, 2-500s.** We continued to monitor the status of these policies, which remain linked to the completion of the FTO SOP.
- **Corrective Action Matrix.** We provided feedback on the latest version and are awaiting workshopping sessions to discuss high-level concerns that will impact a future iteration of this policy.
- **Limitation on Hours Worked, 3-310.** We engaged in workshopping on this policy during the Review Period. On March 31, 2026, MPD submitted this policy for formal approval.
- **BWC Audit SOPs.** We reviewed and collaborated on multiple SOPs during this Review Period, aimed at guiding MPD's auditing of BWC and ICC usage.

Community Outreach Efforts

Public Meetings

ELEFA held a public meeting at the Minneapolis American Indian Center (MAIC) in February of this Review Period. This public meeting was held after numerous tragedies had impacted the Minneapolis community due to ICE activity in the City. Despite the climate of fear and vulnerability in the City, the meeting was well attended. Although immigration law enforcement is not within the scope of the Agreement, in recognition of the trauma the community experienced, we opened the meeting by inviting attendees to share their concerns about the federal activities and MPD's response. The discussion then turned to our work and the MPD's progress under the Agreement. Attendees were highly knowledgeable about the Agreement asked informed questions and engaged actively in discussions about our report and the implementation process, reinforcing the importance of active public engagement in successfully achieving the Agreement's goals.

Community Engagement

After an open application process, we selected the Unity Community Mediation Team to provide on-the-ground support in Minneapolis and to supplement our efforts to receive feedback from the Minneapolis community.

Community and Police Surveys

Paragraph 415 of the Agreement requires the Independent Evaluator to conduct anonymous surveys of the Minneapolis community and MPD officers. Several factors delayed our ability to conduct these surveys but in this Review Period we worked with a vendor to develop survey questions and methodologies, which were then shared with the Parties and modified based on their feedback. We plan to initiate the surveys on May 11th and they will remain open through June 7th. The officer survey will be administered as an anonymous, online-only census of all sworn MPD personnel, accessed via QR code on personal devices, with individual responses provided exclusively to the IE Team and reported only in aggregate. The community survey will run concurrently, with both instruments open May 11 through June 7, 2026. The community survey has both an online component and an in-person element, with surveyors collecting responses in all Minneapolis wards.

Surveys are expected to be conducted and analyzed in the next Review Period. Once analyzed, results will be shared with the Parties and published on our website.

Engagement with MPD Personnel and City Staff

We continued to meet regularly with MPD and City personnel involved in implementing the Agreement, including members of the City Attorney's Office, Department of Civil Rights, IT Department, Property Services, and Emergency Communications. We observed training sessions, intake meetings, Review Panels, QRP meetings, CCPO meetings, and executive steering committee meetings on facilities.

We continued to observe MPD roll call sessions at multiple precincts. Video monitors in roll call rooms to display directives and updates, introduced in the prior Review Period, were functioning as anticipated. Officers continued to express frustration to us with the pace and nature of communications from leadership regarding implementation, including questions about how and why decisions are made.

We also continued to hear a range of views from officers about the Agreement. While some officers, particularly newer officers and lateral hires, expressed enthusiasm about their roles and positive attitudes toward the Department's direction, others continued to voice concerns about the requirements being imposed from outside the Department. We believe that as officers experience the practical benefits of clearer policies, improved training, improved technology, and a fair and functional accountability system, attitudes will continue to shift in a constructive direction. Clear, consistent communication from or by MPD leaders would enhance that shift.

Audits and Compliance-Related Reviews

During this Review Period, we completed a review of misconduct cases in the historical IA and OPCR backlog that resulted in coaching, to assess whether coaching was the appropriate disposition. We shared our findings with the Parties, but we received their feedback after the

Review Period. We will report our findings publicly in the upcoming Review Period.

We continued to review BWC startup check and activation data provided by MPD's Implementation Unit. A full BWC compliance assessment will be conducted once the BWC Audit SOP is appended to fully capture the scope of departmental BWC activity required by policy, and the new UOF policies and training have been in effect for a sufficient period.

We completed an audit of MPD's ICC in-car camera repair and maintenance ticketing system during the prior Review Period. MPD was able to demonstrate a functioning ticketing system for tracking ICC issues and repairs. Findings from that review are incorporated into our Part 6 compliance assessment.

We are developing our methodology for a firearms pointing audit, which will assess MPD's compliance with the Agreement's requirements related to the deployment of firearms. The methodology is under internal review and has not yet been transmitted to the Parties. We anticipate initiating this audit in the next Review Period.

Technical Assistance Provided by the IE Team During the Review Period

The collaborative nature of our work with the Parties often blurs the line between evaluation, informal feedback, and technical assistance. The following list identifies the support we consider technical assistance during this Review Period:

- We provide technical assistance as part of MPD’s policy drafting process. During this Review Period, we provided technical assistance on the following policies: Foot pursuits; Social Media Use in Investigations; Pepper Ball; Supervisor Duties and Responsibilities; and the FTO Program SOP.
- We provided guidance and subject matter expertise to support the City's and MPD's change management approach for EIS deployment, at the City's request.
- We assisted MPD in developing the 8-hour Supervisor Force Review training class and provided direct feedback on lesson plan formatting and content.
- We provided an interpretation of the Agreement's requirements regarding consecutive rest hours under Paragraph 290, following a request from the Parties at a workshop session on March 10, 2026.
- We reviewed the RFP for behavioral health crisis response service for Settlement Agreement requirements and alignment with best practice standard.

Year 3 and 4 Evaluation Plan

The Agreement requires the Independent Evaluator to update its Evaluation Plan for the first two years, to cover years three and four. Because the City’s goals for the first two years proved to be overoptimistic, we have been closely working with the City to develop a feasible implementation schedule, which we will then rely on to develop our next Evaluation Plan, which we expect to complete in June.

3. Expected Progress for Next Review Period

This section provides an overview of the major work items expected to occur during the next Review Period, April 1, 2026, through September 30, 2026.

Status	Agreement Part
Part 2 (Policy)	Approval of: Field Training Officer Program SOP; Warrants policies (9-300s); Limitations on Hours Worked Policy (3-310) Foot Pursuits (7-806) High Pressure Air Projectiles (Pepperball) (5-315) Continued development of: Training Policies (2-500s); Critical Incidents Policy; Supervisory Duties/Responsibilities; Corrective Action Matrix; Social Media Use in Investigations; Engaging with Minors policies (8-100, 8-200, 8-300).
Part 3 (NDP)	Continue development of SSCA, Non-Discriminatory Policing, and Disorderly Conduct training curriculum; Resume Engaging with Minors policy development
Part 4 (Use of Force)	Approval of Supervisor Force Review training; Submit UOF refresher training module for approval; Conduct Firearms Display and Pointing Audit
Part 5 (SSCA)	Finalize Warrants policies (9-300s); Continue development of SSCA and Non-Discriminatory Policing training curriculum
Part 6 (BWC)	Approval of revised BWC Audit SOP; Approval of BWC ICC training module
Part 7 (Training)	Approval of MECC Crisis Intervention Training (after revised submission); Approval of 40-hour CIT Training for recruits; Deliver 2026 CIT Refresher training; Deliver Supervisor Force Review training; Continue Misconduct Investigation Training development; FTO SOP completion
Part 8 (Wellness)	Fill Director of Wellness position; Fill EIS administrator position; identify candidates for EIS Coordinator position; Continue increasing Wellness Unit staffing; Approval of supervisor-specific EIS training from Benchmark; Submit first facilities reassessment (which is overdue); Continue Peer Support program operationalization; Produce updated Employee Support Plan; Produce report on clinical service utilization.

Part 9 (Behavioral Health)	Assess BCR operational functioning against requirements of Paragraph 289; Resubmit and Approval of MECC CIT Training; Complete a formal review of the 40 hour Basic CIT; Receive a Demo by MECC on the BCR Dashboard; Obtain preliminary data on ¶289; Review policy development by MECC related to this section; expecting baseline operational data related to implementation of hours worked policy.
Part 10 (Accountability)	Pilot IA/OPCR Case Management System; Continue backlog reduction; Begin development of misconduct investigation training
Part 11 (Data)	Implement QRP policy; Continue Data Systems Plan implementation; finalize updated public UOF Dashboard and submit for IE approval
Part 12 (IE Team Responsibilities)	Conduct and publish results of community and police surveys.

4. Status of Compliance with Settlement Agreement Requirements

The City and MPD continue to be in the foundational phase of the reform process. As a result, the formal compliance assessment process is still ongoing, and no analysis has yet been conducted under Paragraphs 440 and 441 to determine Full and Effective Compliance with any Part of the Agreement. Once an entire Part of the Agreement is complete and its requirements have been implemented through policy, training, and accountability, we will conduct a formalized qualitative and quantitative assessment to determine the extent to which the City's and MPD's work has resulted in improved officer performance.

New Compliance Determinations During the Review Period

Paragraphs assessed as Partially Compliant during the Review Period:

Part 5 (Stops, Searches, Citations, and Arrests):

- We approved SSCA policies 9-101-113, and 9-201-212. These paragraphs are now Partially Compliant -- Part 8 (Officer Support and Wellness and Early Intervention):
- Paragraph 266(g) (annual in-service wellness training). Upon our approval and observation of the Health and Wellness training delivery, we assess this paragraph as Partially Compliant -- On Track.
- Paragraphs 268, 269(a-e), 270(a-d), 271, 273, 274(a-w), 277, 278, 279, 280, 283(a-e), 284. Upon approval of EIS Policy 2-203, we now consider these paragraphs Partially Compliant -- On Track.

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

- Paragraphs 368(a-d), 369, 370, 371, 372, 373(a-c.viii), 373(e), 374. Upon approval of QRP Policy 2-601, we now consider these paragraphs Partially Compliant -- On Track.

All other paragraphs not outlined above or in prior semi-annual reports remain "Not yet measured." Prior compliance determinations remain in effect unless otherwise noted.

Conclusion

The six months covered in this report reflect the achievements and pitfalls that organizations that are in flux experience, and which we have witnessed in other departments that ultimately transformed. Despite the uneven progress documented in this report, tangible improvements have been implemented. Use of Force policies are live, the Policy and Resource Hub has been launched, the EIS, QRP, and core SSCA policies are approved, and key training programs have been developed and delivered to the Department. These are meaningful achievements, and they reflect the serious effort invested by MPD personnel, City staff, our MDHR colleagues, and our own team.

At the same time, several consistently identified challenges -- bottlenecks in policy development, insufficient staffing for critical functions, uneven communication from leadership, and slow progress on the accountability backlog -- have not been resolved.

Year 3 of the Agreement will require a higher level of execution than Years 1 and 2. Many of the key policy foundations are substantially in place. The task now is to train, implement, and hold personnel accountable. Until that occurs, the public will not experience the changes to policing that MPD has promised and is working to deliver.

Meeting that task will require the City and MPD to close the gaps between stated commitment and operational practice. It will require adequate resources, coordinated leadership, and the kind of consistent, coordinated, and resourced effort and communication that builds confidence across the organization and in the community. We remain committed to providing the evaluation, technical assistance, and public accountability that the Agreement requires, and we look forward to continuing to collaborate with all parties to achieve the transformation change the Agreement requires.

Appendix

Links to Prior Progress Reviews

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

- 1st Progress Review: March 18, 2024, through September 30, 2024
- 2nd Progress Review: October 1, 2024, through March 31, 2025
- 3rd Progress Review: April 1, 2025, through September 30, 2025

Defined Terms for Compliance Status and Goals

We use the following categories to describe the state of progress for management goals, policy revision goals, training development and delivery goals, and audit goals. These definitions are unchanged from prior Progress Reviews and are reproduced here for reference.

Management Goals:

- Completed: MPD/the City has demonstrated to us that the stated management goal has been sufficiently completed.
- In-Progress: MPD/the City are actively working on the stated management goal but have not yet demonstrated satisfactory completion.
- On-Track: MPD/the City remain on track to complete the goal before the target date based on our observations.
- Off-Track: MPD/the City are not expected to complete the item before the target date.
- At Risk: MPD/the City are not expected to complete the goal before the target date based on capacity and timeline concerns.
- Postponed: A mutually agreed upon revision of the expected target date.

Policy Revision Goals:

- IE Approved: MPD/the City has demonstrated that the policy sufficiently adheres to the Settlement Agreement requirements.
- Near IE Approval: MPD/the City have completed workshopping and submitted for final feedback and approval.
- In-Progress: MPD/the City have submitted the policy for initial review and/or are in the workshopping phase.
- On-Track, Off-Track, At Risk, Postponed, Not Yet Started: As defined above or in prior reports.

Training Development and Delivery Goals:

- IE Approved: MPD/City have developed and delivered the training; we have observed it, and determined it meets the Agreement's requirements.
- Completed but does not meet the Agreement requirement: We have observed

the training and determined it does not meet requirements.

- In-Progress: MPD/City have submitted training curriculum for review by us and/or MDHR.
- On-Track, Off-Track, At Risk, Postponed, Not Yet Started: As defined above.

Defined Terms for Compliance Status

We define compliance status using the following scale from the Evaluation Plan:

- Compliant: All material elements of the requirement have been sustainably implemented.
- Partially Compliant -- On-Track: Partial implementation is in place, and the City/MPD are on track for full compliance.
- Partially Compliant -- Off-Track: Partial implementation is in place, but the City/MPD are not on track for full compliance.
- Non-Compliant: The City/MPD have not implemented the requirement and are not on track to do so.
- Not yet measured: The requirement has not yet been formally assessed.

"Full and Effective Compliance" is defined by Paragraph 440 of the Agreement as follows: The City and MPD must demonstrate by a preponderance of the evidence that they have, for the period stated, demonstrated sustained compliance by incorporating all requirements of the Agreement into policy, training relevant personnel, and holding employees accountable in practice.

Glossary of Acronyms and Terms

The following acronyms and abbreviations appear throughout the 4th Progress Review Report. Definitions are provided for reference and to support readers who are new to the Settlement Agreement process.

Acronym	Definition
ABLE	Active Bystandership for Law Enforcement
ATP	Annual Training Plan
BCR	Behavioral Crisis Response
BCRW	Behavioral Crisis Response Workgroup
BWC	Body Worn Camera
CAO	City Attorney's Office
CCPO	Community Commission on Police Oversight
CDM	Critical Decision-Making (Model)
CIT	Crisis Intervention Team
ECO	Expanded Course Outline
EIS	Early Intervention System
ELEFA	Effective Law Enforcement for All
FIT	Force Investigation Team
FRB	Force Review Board

Acronym	Definition
FTO	Field Training Officer
IA / IAD	Internal Affairs / Internal Affairs Bureau
ICC	In-Car Camera
IE	Independent Evaluator
IT	Information Technology
MDHR	Minnesota Department of Human Rights
MECC	Minneapolis Emergency Communications Center
MPD	Minneapolis Police Department
MVVG	Mission, Vision, Values, Goals
NACOLE	National Association for Civilian Oversight of Law Enforcement
NDP	Non-Discriminatory Policing
OCS	Office of Community Safety
OPCR	Office of Police Conduct Review
PAC	Professional Advisory Committee
PBL	Problem-Based Learning
PIC	Person in Crisis
POST	Peace Officer Standards and Training (Minnesota POST Board)
PTE	Police Training and Education (Director)
QAR	Quality Assurance Review
QRP	Quarterly Review Panel
RFP	Request for Proposals
SA	Settlement Agreement
SOP	Standard Operating Procedure
SSCA	Stops, Searches, Citations, and Arrests
TNA	Training Needs Assessment
UOF	Use of Force

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

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

June 15, 2026

Effective Law Enforcement for All
Independent Evaluator

Via Email

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 fourth semi-annual monitoring review issued by the Independent Evaluator, Effective Law Enforcement for All (ELEFA).

After two full years of ELEFA monitoring, and more than six years since MDHR launched its 10-year pattern or practice investigation following the murder of George Floyd, the City of Minneapolis (City) and Minneapolis Police Department (MPD) remain far from achieving the transformational change necessary to address the root causes of race-based policing.

This semi-annual review again affirms what MDHR documented in its April 2022 investigative findings: The City and MPD have flawed accountability systems. The City and MPD's systems are inconsistent, delayed, or opaque. Thus, deeply concerning conduct persists until it becomes publicly visible.

Public confidence and morale quickly erode when both community members and officers cannot clearly understand how misconduct complaints are investigated, why certain decisions are made, or whether meaningful consequences follow. When accountability systems produce outcomes that appear disconnected from the severity of misconduct, credibility deteriorates further.

The City must make a deliberate effort to surface and address the underlying conditions resulting in race-based policing

ELEFA's review underscores that race-based policing will persist until the City and MPD make a sustained and intentional effort to identify and address the systemic conditions driving it. While the report outlines several interconnected obstacles preventing meaningful process, it specifically highlights the persistent deficiencies with City's existing accountability systems. Without intentional work to correct root causes, the same patterns of resistance, misalignment, and lack of accountability will endure. ELEFA specifically highlights:

1. **Persistent problems with Internal Affairs (IA) leadership, staffing, structure, and ability to the job:** "The problems we have documented [regarding Internal Affairs] across prior Progress Reviews… persisted or worsened."

2. **The Chief's review process for misconduct investigations lacks critical independent checks and further weakens the integrity of the review system.** In part, their assessment states: "A significant weakness in the Chief's review process is the lack of structural independence."

3. **Delays and bottlenecks in policy and data systems needed for accountability:** "MPD still lacks the data systems necessary to provide the robust statistical analysis of patterns and trends that the Agreement contemplates."

Looking forward, true accountability needs a holistic approach

As Minneapolis recruits and hires a new Chief of Police, the City has an opportunity to embed lasting practices rather than rely on aspirational commitments. This moment requires leadership that understands and has successfully navigated complex change management, not just procedural changes. At a minimum, true accountability requires:

- Clear lines of responsibility;
- Effective supervision and performance management;
- A commitment to proactively prevent problems before they turn into accountability concerns;
- Transparent decision-making;
- A culture that values intervention and learning;
- Consistent implementation of improvements; and
- Measurable outcomes and public reporting.

As ELEFA affirms: "Transformational change occurs incrementally" and "institutional transformation is a complex, uncertain, and lengthy process." For lasting change, the City must implement these requirements thoughtfully, with intentional sequencing, clear communication and engagement with community members and officers at every level.

MDHR remains committed to supporting this essential work in the years ahead to ensure Minneapolis achieves the transformation the people of this City deserve.

Sincerely,

Rebecca Lucero
Commissioner
Minnesota Department of Human Rights