

The original version of this report was published on June 24, 2026. After publication, the City of Minneapolis requested revisions to its content to properly contextualize the referral process for Coaching to clarify where OPCR intake personnel identified cases for disciplinary outcomes, but the then Chief of Police overrode the recommendation in favor of Coaching. OPCR and IA case data in the charts (percentages, quantities, etc.) refer to where the cases originated, not whether OPCR or IA decided to refer the cases for Coaching.

Overview

The Minneapolis Police Department (MPD) Internal Affairs Division (IA) and the City of Minneapolis Office of Police Conduct Review (OPCR) have been working through their historical backlogs of misconduct investigations. The Independent Evaluator Team (IE Team) seeks to validate whether cases that resulted in non-disciplinary corrective action (i.e., coaching) were appropriately investigated and whether such dispositions were appropriately aligned with the criteria set forth for coaching in the Settlement Agreement (SA), MPD policy, and the Discipline Matrix existing at the time of the alleged violation. Many of these historical backlog cases are very old and were acted upon prior to the Settlement Agreement. The OPCR cases we reviewed ranged from open dates of April 2019 to September 2023. The Internal Affairs cases ranged from open dates of September 2018 to April 2024. Additionally, the IE Team reviewed the average and median durations between when coaching cases were opened to when cases were routed to coaching through the intake process or by the Chief of Police's direction, and when coaching was ultimately recorded as delivered in the system of record.

This review supports the IE Team's responsibility to evaluate whether MPD and OPCR are complying with the Settlement Agreement's requirements that investigations be timely, thorough, effective, and efficiently managed through a centralized case system, while also ensuring that discipline is fair, consistent, and provides due process. By examining past coaching outcomes, the review sought to assess whether these cases met the standards necessary to promote public trust, confidence in MPD, and accountability. The MDHR investigation of the MPD's practices identified the inappropriate use of coaching, a non-disciplinary corrective action, instead of disciplinary action. Members of the public have expressed to the IE Team their distrust in MPD's use of coaching. The cases in the backlog sent for coaching may serve as a baseline for future audits.

According to the MPD Policy Manual and Discipline Matrix, coaching is appropriate for cases that contain only Category A policy allegation(s), the lowest category in the Discipline Matrix. Category A includes conduct that is an isolated incident and had or may have a minimal negative impact on operations or professional image of the Minneapolis Police Department. Pursuant to the Settlement Agreement, coaching cannot be imposed for conduct related to "MPD's policies regarding non-discriminatory and impartial policing, use of force, stops, searches, citations, arrests, and/or an officer's duty to intervene or report excessive force" (SA 317d).

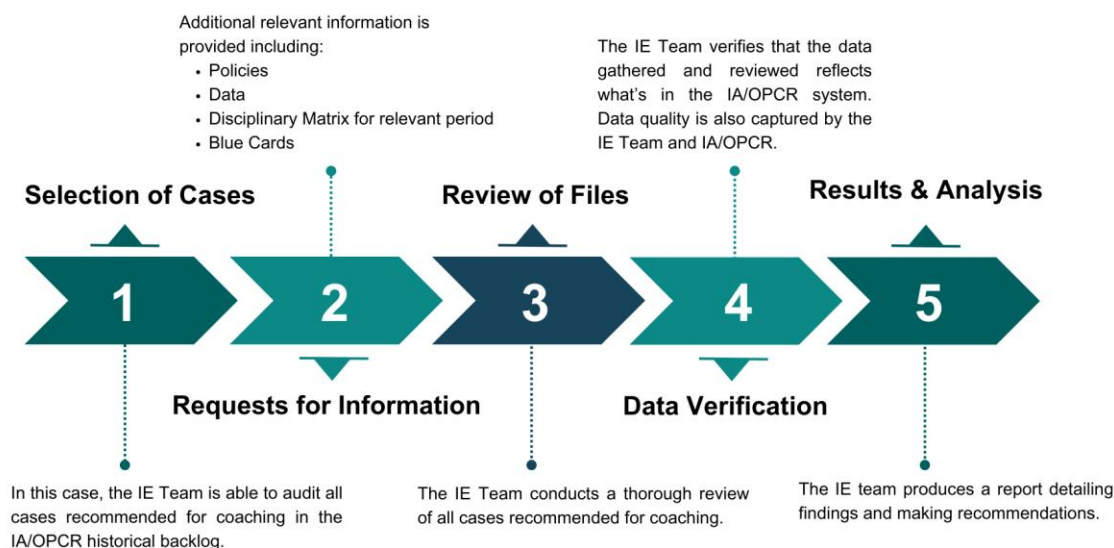
This review found that, of the total cases routed to coaching, 70% of those originated from Internal Affairs (IA) and 38% of those originated from OPCR, respectively, did not meet the criteria for coaching set out in the Discipline Matrix (at the time of the violation) or in the Settlement Agreement. It is worth noting that ELEFA's focus of its data review was on the outcome of coaching and whether cases originated with IA (as an internal complaint) or OPCR (as a public or external complaint). Our report does not focus on who referred the

cases for coaching whether it was from the intake process or at the final Chief’s decision phase.

Several examples of cases reviewed that were not permitted to be coached included: police vehicle pursuit-related violations, failure to write a report, and collisions involving personal injury. This review was not to gauge compliance with the SA, but rather to evaluate historical practices. These results reinforce the need to reform policies and practices concerning the investigation and disposition of complaints. This review also uncovered case file management problems that hamper both the IE Team’s and the respective agencies’ abilities to assess case processing and disposition. Both of these issues—the results and case management difficulties—are being addressed by new Standard Operating Procedures for misconduct investigations and a new case file management system. During this review, the IE Team noted improvements in self-examination, self-reporting, and timeliness.

Cases Included in this Review

The Coaching Review Audit Process



Selection of Cases

For this review, the IE Team examined all cases that resulted in coaching that fell into one of two categories:

- For IA, the historical backlog is defined as any open case that was at least 180 days old as of March 17, 2024.
- For OPCR, the historical backlog is defined as any open case where the complaint was received by OPCR on or before May 23, 2024.

These cases are referred to as “historical backlog cases”. The IE Team reviewed all historical backlog cases, for both IA and OPCR, that either ended in a final disposition of “Closed – No Discipline”, resulted in coaching and were closed upon coaching completion, or were routed to coaching but remained open without final documentation. A review of the systems of record¹ confirmed that all cases that fell into this category for either IA or OPCR were included in the datasets provided by MPD or the City. The IE Team conducted its review on August 19-21, 2025.

There were 44 IA cases and 24 cases from OPCR that met the backlog definition, for a total of 68 cases reviewed by the IE Team. The review also included any cases from the historical backlog that were originally identified for a potential disciplinary action but were instead incorrectly redirected for coaching by the Police Chief. In all these cases, which were identified by IA and OPCR and self-reported to ELEFA prior to the IE Team’s review, the coaching referral did not meet requirements for an acceptable coaching referral in the Discipline Matrix.

Access to Systems & Training

The IE Team was provided full and unfettered access to both Practice Manager and Axon systems for our reviews of all IA and OPCR cases included in this data set. The IE Team was adequately trained by the City Attorney’s Office in the use of both systems. The IE Team was issued city computers for its use to access these systems at any time. The information provided by the City Attorney’s Office, and the level of cooperation for this review, was excellent. Throughout the review, the City Attorney’s Office offered many hours of assistance, while also providing relevant matrices and policies. OPCR and IA personnel were made available for any questions the IE Team had during the case reviews.

This was the IE Team’s first in-depth review of a large number of cases. It was readily apparent at the onset that case files were not uniformly organized and were populated with a variety of case identification labels (e.g., Practice Manager uses a different numbering system than Axon, but the same incident can be covered by both systems, causing confusion). This made it difficult at times to find the necessary review information, and it is also difficult for IA and OPCR to accurately track and manage cases. Some of the differences in file labeling were predictable and understandable due to many of the cases reviewed originating from as far back as 2018. For example, some cases were old enough that four different Discipline Matrices applied to this review. Also complicating the review was the non-sequential numbering system used by both IA and OPCR. The IE Team was provided with supplemental information to accurately assess files.

Review of Files

The IE Team reviewed files routed to coaching and evaluated whether they followed the relevant Discipline Matrix. The historical matrices all lacked any type of prescriptive

¹ The IA and OPCR units used two different systems of record: Practice Manager for cases before 2023 and Axon Standards for cases 2023 and after.

discipline based on the violation/policy. During the review, files were studied both qualitatively and quantitatively, with the IE Team determining how many cases out of the whole were routed for coaching in a manner that did not meet the standards of the Settlement Agreement or relevant Discipline Matrix. However, this review is intended to provide a baseline against which to measure improved compliance over time. It was not intended to assess compliance with the Settlement Agreement. Updated policies and procedures for IA and OPCR were developed prior to the release of this report. Once training on these policies and procedures is complete, and a reasonable time has passed for the new practices to have been in use, a full audit will be scheduled by the IE Team. The IE Team and City personnel found this baseline review beneficial to lay out the groundwork and set expectations for future audits. Findings and recommendations are included in this report in the sections below.

Data Verification

Paragraph 317 of the Settlement Agreement requires IA and OPCR to review complaints and refer them to intake within 30 calendar days of receipt. The IE Team reviewed the data provided from MPD and OPCR systems of record to confirm whether complaints were recorded within 30 days, when cases were routed to coaching, and when coaching was given (if documented). IA and OPCR independently reviewed cases in June 2025, self-identifying instances in which coaching was not the appropriate course of action based on either new procedures required by the Settlement Agreement or the criteria outlined in MPD's current Discipline Matrix.² IA found 31 cases and OPCR found 7 cases in their respective files that were determined to have been inappropriately routed to coaching based on the existing Discipline Matrix at the time of the violation. OPCR also noted data quality issues in 5 cases that were otherwise eligible for coaching.

Results & Analysis

The IE Team reviewed results and drafted this report with key findings and recommendations to address the findings discussed below.

² Effective date September 15, 2023

IE Team Findings

The table below provides a summary of the IE Team's overall quantitative findings from reviewing IA and OPCR cases from their historical backlogs that resulted in coaching:³

Table 1: Summary of Findings from IE Team Review of Coaching Cases from Historical Backlog

Category	IA	OPCR
Cases that resulted in coaching reviewed by IE Team	44	24
Cases eligible for coaching	13 (30%)	15 (62%)
Cases ineligible for coaching	31 (70%)	9 (38%)
Average duration from case open to routing to coaching	205 days	470 days
Median duration from case open to routing to coaching	176 days	371 days
Average duration from case open to coaching delivered	316 days	687 days
Median duration from case open to coaching delivered	308 days	640 days

Of the 44 total IA cases that were routed for coaching or otherwise received coaching as an outcome, the IE Team has determined that 31 of them (70%) were not eligible for coaching according to Discipline Matrix requirements at the time of the alleged policy violation. As stated above, IA was able to self-identify all 31 of these cases prior to the IE Team's review.

Of the 24 total OPCR cases that were routed for coaching or otherwise received coaching as an outcome, the IE Team determined that 9 (38%) were not eligible for coaching according to Discipline Matrix requirements. OPCR was able to self-identify all of these cases prior to the IE Team's review.

For IA, the average duration between the receipt of a complaint that qualified for coaching and it being routed to coaching was 205 days. The median duration was 176 days. Of the 44 cases identified for IA, only two cases were routed to coaching within 30 days (4% of the total).

For OPCR, the average duration between the receipt of a complaint that qualified for coaching and it being routed to coaching was 470 days. The median duration was 371 days. Of the 24 cases identified for OPCR, only three cases were routed to coaching within 30 days (13% of the total).

For IA, 11 of its 44 cases that were routed for coaching remained open and had no recorded documentation that the involved officer(s) received coaching. However, only one of these cases actually qualified for coaching. The other ten fell outside the Discipline Matrix requirements and should have been routed for disciplinary action.

³ It should be noted that the designation of IA and OPCR cases in this chart reflect the origin of the case only and may not necessarily indicate the entity that made the decision to refer the case for coaching. The totals simply represent the outcome of these cases as resulted in being improperly referred to coaching.

For OPCR, 16 of its 24 cases that were routed for coaching remained open and had no recorded documentation that the involved officer(s) received coaching. Of these 16 cases, 13 of them were determined by the IE Team to be eligible for coaching. The other three cases fell outside the Discipline Matrix requirements.

For the 30 closed IA cases in this review, the average duration between the opening of a case and the coaching having been delivered was a total of 316 days. The median duration was 308 days.

For the 9 closed OPCR cases in this review, the average duration between the opening of a case and the coaching having been delivered was a total of 687 days. The median duration was 640 days.

The Settlement Agreement mandates that investigations be timely (paragraph 321, 317), tracked through a centralized case management system (paragraphs 365-367), thorough (324), effective, and efficient (322). Further, guiding principles stress the importance of a disciplinary system that is fair to officers and complainants, timely, consistent, and provides due process. These functions are essential to ensuring accountability, improving officer performance, and promoting public confidence in MPD.

The IE Team's findings indicate that officers were routinely sent for coaching instead of receiving disciplinary action as required by the applicable policy. Additionally, our findings indicate that timely results for effective coaching are a considerable problem for the period audited. While cases are being tracked in two case management systems, the numbering systems used by IA and OPCR are non-sequential and add no value for easy sequential reference.

Case file organization issues (discussed in the previous section) are being addressed by the current leadership of OPCR and IA. The IE Team also anticipates the numbering system and ease of identifying documents to be improved with the adoption of the new case management system. The IE Team also observed that some positive change is already occurring because of new Standard Operating Procedures (SOPs). During this review, the IE Team noticed an increased capacity for self-assessment and self-reporting, and when IA and OPCR identified issues, the IE Team agreed.

Recommendations

Process

- IA and OPCR must ensure that any new case that is routed to coaching is done within the requirements of the Settlement Agreement and the relevant Discipline Matrix.
- IA and OPCR should clarify the guidelines for when cases that originate with multiple allegations can have a specific allegation routed to coaching while the remainder of allegations are investigated.

Data Management

- The new case management system for IA and OPCR should adopt separate and distinct numbering systems so that a case can be readily identified as being assigned to IA or OPCR and the year the case was opened (e.g. OPCR-2026-0001, IA-2026-0001).
- The new case management system for IA and OPCR should ensure that, if a case with multiple allegations has one or more allegations routed to coaching, there is a proper method in the system of record to link the data to the original complaint and the status of that investigation.
- The new case management system for IA and OPCR should have sufficient data analytics to provide a report on any case routed to coaching so that future reviews can be conducted more efficiently.

Future Reviews / Audits

- The IE Team intends to conduct a future review of all cases that result in coaching six months after the implementation of updated policies and procedures, and training, to determine adherence to new guidelines.