INDEPENDENT EVALUATOR PROGRESS REVIEW REPORT

MINNEAPOLIS POLICE DEPARTMENT & THE CITY OF MINNEAPOLIS

REVIEW PERIOD
October 1, 2024 - March 31, 2025

Effective Law Enforcement for ALL

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🌐 www.elefamn.org

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List of Acronyms and Terms

ATP – Annual Training Plan

BCR – Behavioral Crisis Response

BWC – Body Worn Camera

CCPO – Community Commission on Police Oversight

CIT – Crisis Intervention Team

EIS – Early Intervention System

FIT – Force Investigation Team

IA – Internal Affairs

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

NDP – Non-Discriminatory Policing

OPCR – Office of Police Conduct Review

PTE – Police Training and Education (Director)

QRP – Quarterly Review Panel

SOP – Standard Operating Procedure

SSCA – Stops, Searches, Citations and Arrests

TNA – Training Needs Assessment

UOF – Use of Force

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

"City" – The City of Minneapolis government and its various departments

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

"Part" – Refers to one of the 12 sections of the Settlement Agreement

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

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

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

Overview of the Settlement Agreement

In compliance with paragraphs 413 and 414 of the Settlement Agreement and Order ("Agreement") dated July 13, 2023, in the matter captioned *State of Minnesota by Rebecca Lucero, Commissioner of the Minnesota Department of Human Rights, plaintiff vs. City of Minneapolis*, Court File No. 27-cv-23-4177 (Judge Karen Janisch), the Independent Evaluator ("IE" or the "IE Team") submits this 2nd Progress Review for the period of performance beginning October 1, 2024 through March 31, 2025.

The Agreement identifies what the City of Minneapolis ("the City") and the Minneapolis Police Department (MPD) must achieve to comply with the Agreement. The Implementation Progress Evaluation Plan ("the Evaluation Plan"), submitted to the Parties of the Agreement[1] on July 8, 2024, and completed on September 12, 2024, provides the MPD and the City with the framework and prioritization of how, and in what order, to expend their efforts in attaining compliance with the Agreement's requirements. Additionally, the Evaluation Plan is designed to align the Parties and the IE Team on the processes, sequence, and requirements the IE Team will consider when evaluating the implementation of the Agreement and how implementation and compliance will be measured.

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

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[1] "Parties of the Agreement" refers to the signatories of the Agreement; the Minnesota Department of Human Rights ("MDHR") and the City of Minneapolis.

Progress Review Requirements

This semi-annual report is submitted to fulfill the requirements of Settlement Agreement paragraphs 413 and 414:

B. Independent Evaluator Progress Reviews

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

   a. The progress made by the City and MPD under the Evaluation Plan, as well as an overall evaluation of the City's and MPD's progress to date in complying with the Agreement;

   b. A description of the work conducted by the Independent Evaluator during the reporting period, including a summary of the annual community evaluation;

   c. The methodology and specific findings for each review conducted, redacted as necessary for privacy concerns and legal compliance;

   d. A projection of the work to be completed during the upcoming reporting period and any anticipated challenges or concerns related to implementation of the Agreement;

   e. The extent to which the requirements of this Agreement have been: (i) incorporated into implemented policy; (ii) trained at the levels set forth in this Agreement for all relevant MPD officers; (iii) reviewed or audited by the Independent Evaluator in determining whether MPD has reached Full and Effective Compliance, as defined in Paragraph 440, including the date of the review or audit and the data and materials relied upon for the review or audit; and (iv) found by the Independent Evaluator to have reached Full and Effective Compliance, and the date of this finding;

   f. The Independent Evaluator's recommendations regarding necessary steps to achieve Full and Effective Compliance, as defined in Paragraph 440; and

   g. The extent to which the Independent Evaluator has provided technical assistance.

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

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), which serves as the Independent Evaluator, visit our website at:
http://elefamn.org

Executive Summary

During the first year of the Independent Evaluator (IE) Team's tenure, the City and MPD have made significant strides and demonstrated a serious commitment to implementing the Agreement. This first year has represented the foundational phase of the implementation process, where the focus has been on updating policies and training, improving working conditions, implementing system upgrades and strengthening accountability.

This second Progress Review report documents the important and meaningful efforts the City and MPD have made toward implementation. Several policies have been revised, improved training is being developed and delivered, assessment and improvement of the technology and facilities necessary to drive and sustain implementation are underway, and progress has been made toward eliminating the unacceptable historical backlog of misconduct complaint investigations. These successes are attributable to the hard work of the MPD and the City but also to the engagement, support, and guidance of the IE Team and Minnesota Department of Human Rights (MDHR).

MPD personnel have worked long hours, including some weekends, and should be commended for the progress they have made in this important foundational year. Nevertheless, implementation has proven to be more time-consuming than initially envisioned, for reasons explained in this report. Along the way, lessons have been learned about this process. The Parties are applying these "lessons learned" to improving the implementation process going forward.

Although the City and MPD have not met all the goals targeted for "Year One" of the Evaluation Plan, the IE Team's view is that MPD and the City have made important and demonstrable progress towards meeting the Settlement Agreement's requirements and the Evaluation Plan's foundational goals. Based on the IE Team's collective experience and knowledge of court enforceable police reform agreements across the country, the City and the MPD have made more progress toward building a foundation for sustainable reform in the first year of monitoring than nearly any other jurisdiction.

The Minneapolis community has also been an engaged partner in this process, providing feedback to the MPD on draft policies, providing information to the IE Team about their lived experience, convening meetings between the IE Team and their organizations, and attending the IE Team's public meetings, where updates on the progress toward compliance are provided.

This report documents the progress the City and MPD have made as well as the challenging work ahead that will be necessary to fulfill the Agreement's requirements. While the City and MPD still have more work to do to meet the Year 1 goals laid out in the Evaluation Plan, the IE Team's overall assessment is that the MPD and City are making steady, demonstrable progress toward establishing the foundation essential to sustaining compliance with the Agreement.

Key Takeaways During the Review Period:

- During the review period, the IE Team provided extensive feedback and collaborated with MPD, the City, and MDHR on the multiple policy topics and standard operating procedures (SOPs). Importantly, the MPD completed revision of its Use of Force policies, which the IE Team evaluated and has approved. The Use of Force policies consist of a suite of 17 policies. Revising them to meet the Agreement's requirements was a time-intensive effort that required extensive feedback and workshopping from MDHR and the IE Team.

- MPD also completed and received the IE Team's approval of its Mission/Vision/Values/Goals and Crisis Intervention policies. In addition, the MPD performed extensive work on a host of additional policy topics throughout the review period, – including Non-Discriminatory Policing, Stops/Searches/Arrest/Citations, Misconduct Investigations, Body-Worn Cameras and In-Car Cameras, and Health and Wellness, among others – which involved extensive collaboration with MDHR and the IE Team.

- MPD submitted draft training curricula for 2025 Crisis Intervention Team (CIT) 8-hour Refresher and the 2025 Use Force (Day 1) 8-hour training, both of which are expected to receive IE approval in the next review period.

- MPD completed and the IE has approved the Training Needs Assessment (TNA) and Annual Training Plan (ATP) that are required under Part 7 of the Agreement.

- MPD and the City have completed the Data Systems Plan, and the IE Team has determined it satisfies the Agreement's requirements. The Plan will guide technology implementation efforts that are required under the Agreement.

- MPD and the City have nearly completed the Facilities, Equipment and Non-Database Technology Plan, which will provide direction on improving the working conditions of MPD personnel. Progress is actively being made toward identified repairs and upgrades required under the Plan. The City has established an executive steering committee to provide updates and manage project goals monthly.

- MPD has selected 21 officers to serve as peer support members, all of whom have either received or will receive training under a 32-hour, state recognized peer support curriculum. Peer support members provide mentorship, outreach, and emotional support to fellow officers who may be struggling and/or may have experienced a traumatic event and can connect officers to additional wellness resources.

- MPD has nearly completed its Employee Support Plan. The department is in the process of making additional revisions requested by the IE Team. MPD has not, however, sufficiently staffed officer wellness functions to align with the proposed Employee Support Plan. As of March 31, 2025, there were only two full time personnel assigned to the Wellness Unit, which is insufficient to support the requirements under the Agreement.

- MPD conducted the 2025 8-hour Crisis Intervention Refresher training required for all officers. While this training contains the core components of refresher training, additional improvements are needed, as described in the training section of this report.

- A local for-profit organization continues to provide the required Behavioral Crisis Response (BCR) alternative response program. The City moved the BCR program under the Fire Department and has made substantial efforts to assess current BCR data and identify gaps

in that data. The City is also working to assess operational practices and deficiencies, dispatch protocols and increased collaboration. The IE Team looks forward to ongoing improvements and assessment of the City's non-law enforcement, co-response and specialized MPD response to higher risk mental and behavioral health service calls.

Anticipated Progress for Next Review Period

This section provides a brief overview of major work items expected to occur during the next review period (April 1, 2025, through September 30, 2025).

Settlement Agreement Part	Major Work Item During Next Review Period
Part 2 (Policy)	IE approval of the following policies and standard operating procedures (SOPs): • Non-discriminatory policing • Procedural Justice • Emergency Medical Response • Body-Worn Camera and In-Car Camera • Health, Wellness and Safety policies • Internal Affairs (IA) & Office of Police Conduct Review (OPCR) Misconduct Investigations SOPs • Early Intervention System Significant progress and possible IE approval of the following policies: • Stops, Searches, Citations and Arrest (SSCA) policies • Accountability and Misconduct policies • Disciplinary Matrix
Part 3 (NDP)	• Finalize non-discriminatory policing related policies (see Part 2)
Part 4 (Use of Force)	• Eliminate UOF quality assurance review case backlog • Develop Critical Incident Communications Plan
Part 5 (SSCA)	• Significant progress and possible IE approval of SSCA policies (see Part 2)
Part 6 (BWC)	• IE approval of Body-Worn Camera (BWC) policy (see Part 2) • Develop and implement IE approved trainings on updated policy • IE approval of SOPs for randomized Supervisory BWC checks and monthly Implementation Unit BWC reviews
Part 7 (Training)	• Deliver 2025 8-hour Crisis Intervention Team (CIT) refresher training • Deliver CIT 40-hour course for recruits • Deliver IE approved UOF training (Day 1) • Develop and deliver IE approved UOF training (Days 2 & 3) • Develop training for SSCA & Non-Discriminatory Policing • Develop training for conducting Misconduct Investigations • Develop and deliver IE approved training for Early Intervention System (EIS) • Develop training for Officer Health and Wellness
Part 8 (Wellness)	• IE approval of Health and Wellness policies (see Part 2) • IE approval of EIS policy (see Part 2)

	• Develop SOPs for metrics and system management related to EIS • Complete Facilities, Equipment and Non-Database Technology Plan and begin implementation on major projects identified in the plan • Complete peer support training for all current team members • Complete Employee Support Plan • Increase staffing of the Wellness Unit • Complete Officer Health and Wellness and EIS training curricula with trainers completing the Instructor Development Course • Launch of the Wellness App, an application on members' phones that provides mental health resources, including contact information for peer support members, clinical service providers, exercises for meditation, breathing etc. This app is commonly used in emergency service professions. • Ongoing improvement of MPD's Wellness Unit facilities and resources • Complete vendor selection for ongoing clinical services for the MPD
Part 9 (Mental and Behavioral Health)	• Integrate crisis intervention policy and key guiding principles into Use of Force and other MPD training • Collect baseline data supporting the requirements related to BCR response teams and bridge current gaps in data • Revise 8-hour CIT training, approved by the IE prior to launch • IE completes formal review of the 40-hour CIT training • Develop updated policy supporting ¶290 requirements related to number of hours worked by MPD members • Demonstrate progress by MECC (911 Call Center) toward development of a Crisis Intervention training for 911 telecommunicators, with IE Team review and approval of curricula prior to launch • Assess efforts to expand non-law enforcement co-response and specialized MPD response to higher risk service calls involving a behavioral health component • Hire and onboard an MPD CIT Coordinator
Part 10 (Accountability)	• IE approval of SOPs for Internal Affairs (IA) and OPCR intake and investigative processes • Significant progress and possible IE approval of Accountability and Misconduct related policies (see Part 2)
Part 11 (Data)	• IE approval of Quarterly Review Panel (QRP) policy • Establish data and systems governance as outlined in the Data Systems Plan • Go-Live for Vehicle Pursuit Module • Go-Live for Use of Force Form for use by Force Investigation Team (FIT) unit • Go-Live for IA and OPCR Misconduct Case Management System

1. Progress made by the City and MPD under the Evaluation Plan, as well as an overall evaluation of the City's and MPD's progress to date in complying with the Agreement

Policy-Related Activities (Part 2)

Policies Posted for Public Feedback During the Review Period

During the review period, MPD posted the following policies on its website for public feedback. Duration of the posting periods are listed alongside each topic area.

- Engaging with Minors (45-days – part of SSCA)
- Crisis Intervention (45-days – part of SSCA)
- Preface / Mission, Vision, Values, Goals (45-days – MVVG)
- Emergency Medical Response (45-days)
- Non-Discriminatory Policing, Procedural Justice and Professional Policing (45 days – NDP)
- Critical Decision-Making (45-days – part of UOF)
- SSCA policies (45-days)
- BWC/ICC policy (45-days)
- Accountability and Misconduct policies (30-days)
- Recruitment and Training (30-days)

The IE Team commends MPD's commitment to receiving public comments on policies covering required topics outside the 4-core topic areas outlined in paragraph 28 of the Agreement (Mission/Vision/Values/Goals, Non-Discriminatory Policing, Use of Force, and Stops/Searches/Citations/Arrests). Policies that were posted for fewer than 45 days (as indicated above) are not considered part of the 4-core policy topics that are specified by paragraph 28 of the Agreement and therefore are not bound by the 45-day posting timeline. The IE Team considers a 30-day duration sufficient for solicitation of public feedback on policy topics outside the 4-core areas. MPD posts its policies for public comment on this webpage: Police Policies & Feedback - City of Minneapolis.

Enhancement of Policy Feedback, Workshopping, and Redrafting Process

The Agreement contemplates a policy drafting process in which MPD submits draft policies to MDHR, which has 14 days to comment, and to the IE Team, which has 30 days to comment or make a compliance determination. Experience convinced the IE Team, however, that a more flexible, collaborative policy drafting process would better serve the Agreement's goals, while also providing the Parties with the benefits of the IE Team's expertise. Under this approach, the policy review process has become a three-phase collaborative process, which is summarized in the diagram on the following page:

Phase 1: Informal Feedback

- MPD creates/updates policy draft and incorporates public comment and officer feedback (when available)
- IE Team receives policy draft from MPD and conducts an initial review to provide technical assistance and subject matter expertise related to topic area
- MPD meets with IE Team to go over its feedback and rework policy draft(s)

Phase 2: Workshopping

- MPD provides updated draft of policy to MDHR and IE Team based on Phase 1 efforts
- MDHR and IE Team provide written feedback on draft policies
- Parties meet to collaborate and negotiate language edits
- Multiple workshopping sessions may occur for more complex issues and to resolve any disagreements on policy language

Phase 3: Formal Submission

- After Phase 2 is completed, revised policies are considered "Near Final" and are ready for formal submission to MDHR and IE Team for final compliance reveiw
- MDHR has 14 days from submission to provide feedback
- IE Team has 30 days to provide feedback or assess the updated policy as compliant under the terms of Agreement

- **Phase 1: Informal feedback exchange between MPD and the IE Team.** At this stage, the IE Team conducts an initial review and provides in-depth feedback and technical assistance to MPD on policy content and form. Generally, draft policies received by the IE Team during this phase already have public and officer/supervisor feedback incorporated by MPD.
- **Phase 2: Workshopping period with the IE Team, MPD, and MDHR**. After MPD has applied edits based on the feedback it received in Phase 1, MPD submits an updated draft of the policy to both MDHR and the IE Team, which then provide MPD detailed feedback on the draft. The Parties then schedule one or more workshop sessions to review suggested edits, address questions, and provide subject matter expertise. These workshop sessions are designed to ensure that MPD understands the feedback, resolve any disagreements, and agree upon final language. While Phase 2 efforts can be time-intensive, especially on larger policies such as Use of Force, the IE Team believes they have proved immensely productive in creating a consensus policy document. The resulting policy draft is one that all Parties generally feel comfortable with the content, and that it aligns with Agreement requirements, reflects best practices, and considers public and officer feedback.

- **Phase 3: Formal compliance submission**. After multiple rounds of workshopping to ensure alignment amongst the Parties, MPD then submits the updated draft policy for a formal compliance assessment to the IE Team and MDHR, under the provisions of ¶404. The IE Team then conducts a final, comprehensive review to ensure that all outstanding matters have been properly addressed and that all Agreement requirements have been met. The IE Team also completes a follow-up review of the original feedback received from the public and from officers to determine how MPD considered the feedback it received. Per ¶404, MDHR has 14 days to review and provide any comments, and the IE Team has 30 days to either provide additional feedback on the policy or approve the policy to move forward.

In some instances, the IE Team and MDHR provide policy feedback that encourages MPD to adopt amendments to policies that are not required by the Agreement, but that do align with best practices related to accountability, transparency, community engagement, and procedural justice. MPD has been receptive to considering and adopting many of these suggestions, demonstrating its commitment to ensuring that the policies not only satisfy compliance with the Agreement but can also provide the highest quality policing services to the residents of the City of Minneapolis. The IE Team appreciates the MPD's embrace of these higher standards.

Overview of Policy Work Completed by MPD and the City During the Review Period

Below is a summary of the status of the policy work as of the end of the reporting period. More detail regarding the efforts made on each policy is provided in Section 2 of this report.

MPD and the City completed and received IE approval on the following policies:

- Preface / Mission, Vision, Values, Goals
- Use of Force policies (5-300s, plus 7-801, 7-802, 7-804)
- Crisis Intervention (7-803)

MPD and the City entered the Phase 3 formal submission process on the following policies and SOPs, meaning they are "Near Final" as of the end of this reporting period:

- Emergency Medical Response (7-350)[2]
- Non-Discriminatory Policing and Procedural Justice (5-104 and 5-109)
- Health, Wellness & Safety Policies (3-500s)
- IA & OPCR Misconduct Investigations SOPs
- Body Worn Cameras and In-Car Cameras (4-223)

MPD and the City entered the Phase 2 "Workshopping" process for the following policies and SOPs:

- Stops, Searches, Citations & Arrest policies (9-100s, 9-200s, 9-300s)
- Accountability and Misconduct policies (2-100s)

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[2] On April 14, 2025 (after this reporting period), the IE Team approved Policy 7-350, Emergency Medical Response.

MPD and the IE Team engaged in the Phase 1 "Informal Feedback" process on the following policies and SOPs:

- Early Intervention System (2-203)
- Disciplinary Matrix
- Recruitment and Training policies (2-500s)
- Field Training Officer Program SOP
- Quarterly Review Panels
- BWC Checks SOP

Implementation of New Policy Management Software

During this review period, the MPD demonstrated to the IE Team the capabilities of the new policy management software under development. The IE Team was left with a very positive impression of its capabilities. The software will be designed to house all MPD policies in a user-friendly format, allowing for robust searching, linking related policies and resources, and providing pop-up definitions when hovering over a defined term. MPD anticipates that this new policy management software will go-live this summer. The IE Team encourages MPD to seek officer feedback as it develops the requirements for the software to ensure it will be responsive to the needs of its members. Once the software is developed and launched, it will constitute a substantial improvement for both officers and the public to access and digest MPD policies in a much more user-friendly and effective manner.

MPD's Policy Development Efficiency and Capacity Challenges

As detailed above, the workload for delivering the required policy updates under the Agreement is substantial. The IE Team appreciates the amount of effort required and the level of effort demonstrated by the Parties. That said, throughout this first year of Agreement implementation, the IE Team has noticed that, at times, MPD has taken significant time to submit policies for initial review as well as to respond to feedback it receives. The adoption of compliant policies is a foundational requirement, and the completion of policies will ultimately determine when other elements of the Agreement, including training, supervision, and accountability measures, can be implemented. Despite the hard work of those currently tasked with policy drafting responsibilities, it appears that MPD may require additional personnel with policy drafting experience to timely meet goals outlined in the Evaluation Plan. MPD and the City have reported to the IE Team on their hiring of a vendor to add capacity for the policy drafting process, which the IE believes can help address this issue.

The IE Team's understanding of MPD's internal steps for policy review and approval is that these appear to be prolonging the policy development process. The IE Team encourages MPD to review its internal processes and find ways to improve turn-around times. It is essential for the City and MPD to allocate the expertise and resources necessary to expedite a quality drafting process. Beyond that, the Year One policy drafting experience has yielded lessons that the Parties and the IE Team can apply to improve the process going forward.

Non-Discriminatory Policing (Part 3)

Non-Discriminatory Policing Policy and Procedural Justice Policy Revisions are Still In Progress

During the review period, the MPD updated policy drafts for Non-Discriminatory Policing and Procedural Justice (5-104 and 5-109). As reported in the previous section, these policy revisions are nearly complete. Once formal submissions are approved by the IE Team, MPD will begin the development of training curriculum related to these policies.

Use of Force Related Activities (Part 4)
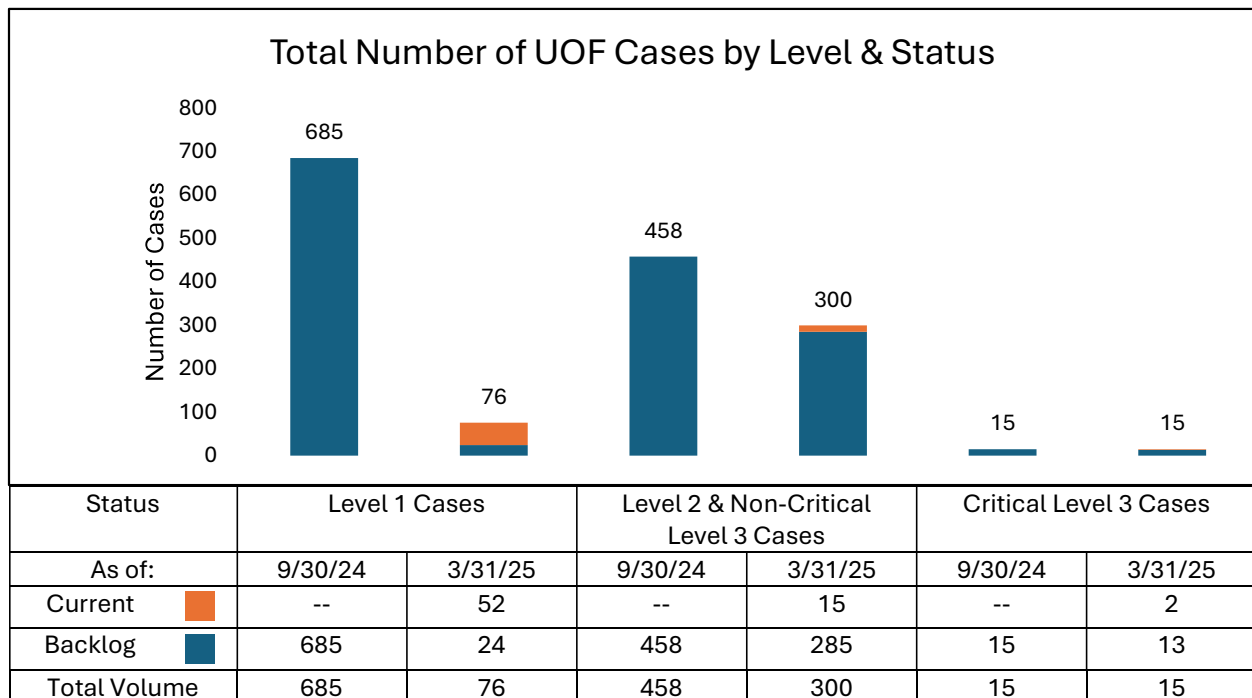
Use of Force Policy Revisions Have Been Completed

As noted above, the IE Team approved MPD's revised Use of Force (UOF) policies. This was a significant achievement, given that use of force is covered in 17 policies and represents an important milestone in MPD's progress toward improving its core policies. Achieving approval of these policies was an important, foundational step toward addressing the major requirements of the Agreement related to Use of Force.

Status of Use of Force Reporting Quality Assurance Review Backlog

The Internal Affairs Division's Force Investigation Team (FIT) Unit met with the IE Team to provide updates on staffing and training-related issues that were discussed in the IE Team's prior semi-annual report. FIT indicated that, due to significant staffing capacity and training deficiencies, a significant backlog in the UOF quality review process had developed. MPD reported that there were simply not enough staff dedicated to FIT to conduct the final reviews of UOF incidents in a timely fashion. It should be noted, however, that these incidents had already been reviewed by field sergeants, and then by field lieutenants in accordance with policy, but that the final quality assurance review (QAR) by the FIT Unit had not yet been completed.

QARs completed by the FIT unit verify whether officers have complied with policy and whether supervisors have properly reviewed the UOF incident. It is also important to differentiate the historical backlog of these reviews which is separate from the historical backlog of misconduct complaints investigated by IA and OPCR.
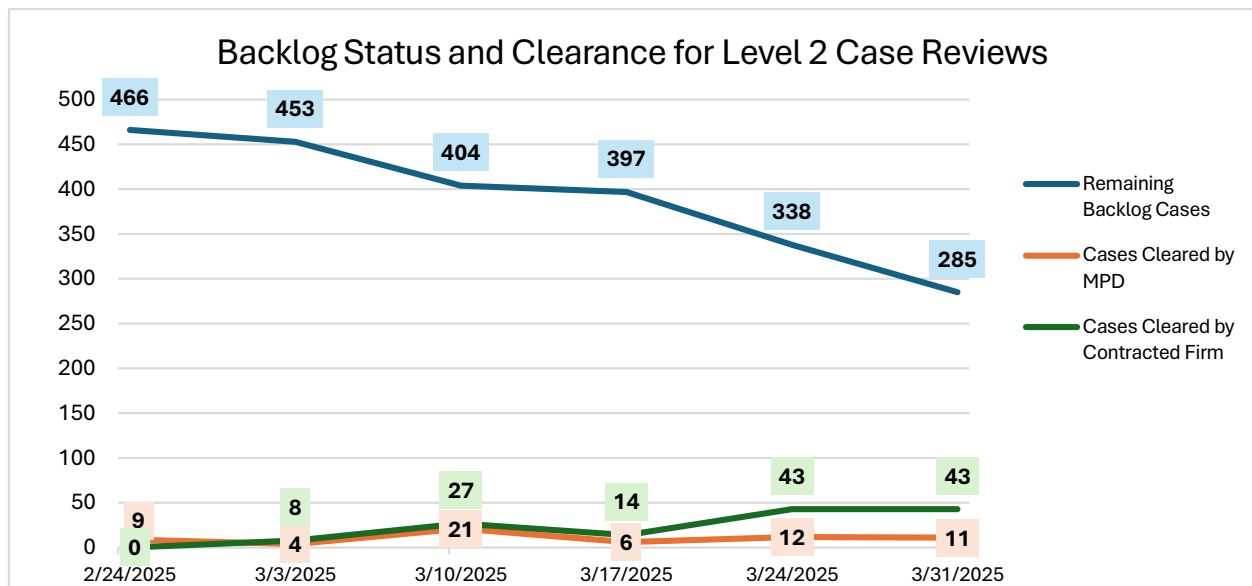
For this second semi-annual report, the IE Team has categorized these UOF case reviews into "current" status (received by FIT within the past 30-days) and "backlog" status (received by FIT by more than 30-days prior). The chart on the following page compares data previously reported as of September 30, 2024, and "current" as of March 31, 2025.

Total Number of UOF Cases by Level & Status

Status	Level 1 Cases		Level 2 & Non-Critical Level 3 Cases		Critical Level 3 Cases	
As of:	9/30/24	3/31/25	9/30/24	3/31/25	9/30/24	3/31/25
Current	--	52	--	15	--	2
Backlog	685	24	458	285	15	13
Total Volume	685	76	458	300	15	15

As of March 31, 2025, MPD reports there were 52 Level 1 UOF cases in current status and 24 Level 1 UOF cases in backlog status for a total of 76 Level 1 UOF cases to be reviewed. This is a significant reduction in the Level 1 UOF case review backlog reported as of the end of the first semi-annual report review period (638 Level 1 UOF backlog cases as of September 30, 2024).[3] This represented an 89% reduction of the overall case volume in the Level 1 category that took place during the review period.

FIT also reported that at the end of September 2024, the backlog consisted of 458 Level 2 & Non-Critical Incident Level 3 UOF case reviews. By the end of this review period, the backlog had been reduced to 285 cases, a 34% reduction.

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[3] Note: In the first semi-annual report all cases were compiled together into one number and no distinction between current and backlog status was made.

Backlog Status and Clearance for Level 2 Case Reviews

Chart: "Backlog Status and Clearance for Level 2 Case Reviews"

Remaining Backlog Cases: 466 (2/24/2025), 453 (3/3/2025), 404 (3/10/2025), 397 (3/17/2025), 338 (3/24/2025), 285 (3/31/2025)

Cases Cleared by MPD: 9, 4, 21, 6, 12, 11

Cases Cleared by Contracted Firm: 0, 8, 27, 14, 43, 43

During the review period, FIT had reduced the backlog of Critical Incident Level 3 UOF case reviews from 15 to 13 cases. Critical Incident Level 3 UOF cases typically represent the most complex and labor-intensive reviews and can take considerably longer to complete.

The IE Team has met regularly with MPD to provide technical assistance in managing its backlog reduction efforts, and over the next year the IE Team will inspect the FIT's reviews to verify that MPD's reported data is accurate and the QAR was sufficient in quality.

Capacity Building Efforts to Manage FIT Caseload

MPD reports that a new Commander will be assigned to manage the FIT Unit, which has evolved into a separate unit due to the demands of reviewing UOF incidents. Similar to the IA Commander, the FIT Commander reports to the Bureau Chief of IA. This is a positive development as it brings increased command expertise to oversee the important task of reviewing UOF investigations professionally.

MPD also reported that the two sergeants re-assigned to the FIT Unit have completed all their historical IA investigative cases and are now able to work full-time on UOF case reviews. FIT further stated that the two civilian force investigators assigned to the unit have each completed approximately 180 hours of investigative training and are now certified to conduct UOF investigative case reviews.

MPD reported that it can take approximately three days for a case investigator to complete a QAR on a level 2 use of force, while it can take less than a day for a FIT sergeant to complete the same task. While both positions have additional duties outside of completing level 2 QARs, MPD reported that the current process requires a FIT sergeant to review the QAR's that are completed by case investigators, which extends the time of completion for the QAR by as much as another full day. As the civilian investigators gain additional experience, FIT anticipates they will continue to become more efficient, and once their coordination efforts on the implementation of the new misconduct case management systems lessen, they will have additional capacity for completing QARs.

as its assigned sergeants and civilian investigators have gained more experience, they have become more efficient in conducting case reviews, and the estimated time it takes to complete a case review improved from approximately eight hours per case to approximately six hours per case. These positive developments in training and experience have also contributed to the reduction in backlogged UOF case reviews.

Given the significant burden of managing such a large UOF case review backlog, the IE Team compliments the proactive decision by the City to contract with an outside law firm to provide additional investigators to complete UOF case reviews and minor misconduct investigations. This increased capacity has allowed the FIT Unit to more effectively address this critically important Agreement requirement. The significant reductions observed in the UOF case reviews backlog are directly attributable to the addition of this capacity.

The IE Team has expressed its concern that the authorized funding for the outside law firm contract is quickly being exhausted, and if the contract cap is not increased the UOF investigative case backlog will simply return to unmanageable levels. The City should seek to either extend the contract or hire/assign additional staffing to support the FIT Unit to prevent this from occurring. This is especially important given that new UOF policies and training will likely increase case volume for reviewing UOF incidents.

Progress on Critical Incident Response and Crisis Communication Plan

MPD and staff from the Office of Community Safety (OCS) also met with the IE Team to begin creating a new critical incident response policy and incorporating it into the City of Minneapolis' Crisis Communications Plan. This plan will outline how the MPD and the City of Minneapolis are to respond publicly to critical incidents such as an Officer Involved Shooting (OIS).

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

Stop/Search/Citation/Arrest Policy Revisions are Still In Progress

During the review period, the IE Team participated in the early stages of policy reviews related to this section. MPD began working on redrafting the policies for adult arrests and citations after receiving informal feedback from the IE Team. The adult arrest and citations policies became part of the SSCA suite of policies in November 2024, when all SSCA policies were sent to the IE Team and MDHR for workshopping. MPD also posted the SSCA policies online for public comment. The IE Team agreed to provide feedback and meet with MPD to address any issues as early as possible.

The IE Team sent preliminary comments to MPD on the draft stops and searches policies during the month of December 2024 and provided feedback on the arrest and citations policies in January 2025.

From December 2024 to February 2025, MPD, MDHR and the IE Team participated in five workshopping sessions, covering stops, searches, citations, arrests and warrants. MPD and the City have made changes to the draft SSCA policies based on the informal feedback and workshopping sessions from previous months and shared these updated drafts with the IE

Team and MDHR. Given the overall volume of content for SSCA and the priority of the MPD policy team on the topic of UOF, the Parties and the IE Team agreed to pause workshopping on the SSCA policies to focus on completing UOF and other policies. SSCA policy workshops will begin again in April 2025 with the goal of having MPD submit the policies for a compliance determination during the next reporting period. Once the SSCA policies have been approved, training curriculum development will begin.

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

Body Worn Camera and In-Car Camera Policy Revisions are Still In Progress

During the review period, MPD submitted an updated policy for Body Worn Camera (BWC) and In Car Camera (ICC) usage to MDHR and the IE Team. As of the end of the review period, the IE Team and MDHR were coordinating their feedback to provide an updated version of the policy for MPD to consider. Overall, the content of the policy has been reviewed, and the IE Team will provide MPD with its comments based on its workshopping effort. Upon finalizing the policy, MPD will begin developing a training plan for the new policy and updates to accountability structures for this policy, which will also be included as part of the training.

Update of SOPs for Reviewing Activations of BWCs and ICCs

MPD has not yet completed this requirement because the policy revisions have not yet been finalized and approved by the IE Team. Once completed, MPD will use the revised BWC and ICC policy to begin developing standard operating procedures for conducting regular checks of BWC and ICC usage in alignment with the policy. The SOPs will also provide guidance to supervisors who are conducting randomized checks so that this practice can be standardized. MPD is projecting the completion of these efforts by the end of the next review period.

IE Audits of BWC Activation to Begin After Training on New Policies and SOPs are Completed

MPD has not yet completed the final BWC and ICC policy or implemented training; therefore, the IE Team is not yet able to assess whether MPD's reviews of BWC activation are compliant. The MPD Implementation Unit has consistently been reviewing whether MPD officers are activating BWC and ICCs as required in their current policy. Once MPD's policy, SOPs, training and accountability measures are in place, the IE Team will then be in a position to commence formal compliance auditing.

Training-Related Activities (Part 7)

MPD Has Made Progress on the Annual Training Plan and Training Needs Assessment Requirements

The IE Team had previously reviewed and provided feedback on MPD's 2024 Annual Training Plan (ATP) and the Training Needs Assessment (TNA), which was conducted by an outside consulting group. The TNA was high-level in scope and provided critical feedback on the current state of training at MPD, such as a lack of proper facilities and insufficient

professional development for instructors to effectively train personnel. The TNA did not, however, provide a roadmap to how MPD should assess its annual training needs, which is an important component in the development of an ATP. In response, the IE Team coordinated meetings between MPD and other law enforcement agency "Academic Deans" (positions similar in duties to the Director of Police Training and Education (PTE), who have extensive experience in creating TNAs). MPD used these meetings to gain an understanding of the process for creating a TNA and how to use the results to develop an effective ATP. With the IE Team's support, the MPD has been able to develop a very professional Training Needs Assessment process that provided an effective roadmap to creating the 2025 Annual Training Plan.

Both the MPD's 2025 TNA and ATP are exceptional training documents that achieved *substantial compliance* by the IE Team and MDHR for paragraphs 183, 184, and 185 of the Agreement. The IE Team believes that MPD's final 2025 TNA and ATP are model training documents that other law enforcement agencies can and will emulate in the development of their own ATPs.

The 2025 ATP included a training calendar that outlined the timelines for when each course or class was projected to be taught. This calendar is very important as the MPD has limited classroom space and instructors to teach all the courses and classes scheduled, and any changes to the calendar can result in conflicts with classroom or instructor availability. MPD is required to inform the IE Team and MDHR of any changes to the calendar and a discussion is held regarding the rationale for any revision. During this review period, MPD changed the timelines for several classes and courses that were published in the original ATP. All these changes were reviewed by the IE Team and determined to be justified. The IE Team believes in the training construct that it is better to deliver training *"right"* rather than *"rushed"* and will continue to monitor the calendar so that MPD provides the best possible training to its members.

MPD Hired a Director of Police Training and Education

During the review period, MPD hired a Director of Police Training and Education (PTE) who has a professional background in education and is a non-sworn, professional staff member who will be responsible for managing and approving all curriculum and instructional development for MPD training efforts. This is a major achievement for MPD as the IE Team strongly believes that MPD needed to hire a Director of PTE, given the significant volume of training requirements required by the Agreement. The IE Team has already begun working with the Director of PTE on a variety of requirements such as the creation of the Professional Advisory Committee and a review of the 2025 Use of Force training curriculum. The IE Team looks forward to developing a productive relationship with the Director of PTE and believes that his hiring will provide much needed capacity for MPD to achieve compliance on all training related paragraphs of the Agreement.

MPD Efforts on Updating its Field Officer Training Program

The MPD also conferred with the IE Team on the development of a more effective Field Training Officer (FTO) program. Unfortunately, MPD has experienced significant problems in

the administration of its FTO program, as was outlined within the TNA, and which has been expressed by officers to members of the IE Team. MPD expressed to the IE Team its desire to improve its FTO program. To that end, the MPD evaluated other agencies' FTO program policies and SOPs and began updating its own. The IE Team provided comments on the updated FTO program policies and SOPs and anticipates MPD will continue this work in the next review period.

Crisis Intervention Training Requires Further Improvement

During the review period, MPD completed its revisions to the Crisis Intervention policy (7-803) and the IE Team has reviewed and approved the draft.

The IE Team also evaluated the 2025 Crisis Intervention Team (CIT) 8-hour refresher training class curriculum. Comments on the curriculum were sent to the outside vendor that provides the training - MN-CIT - from both the IE Team and MDHR. Unfortunately, unbeknownst to the IE Team, MN-CIT initiated the training before the IE Team was given the opportunity to provide feedback or grant final approval of the curriculum, which is a requirement under the Agreement. This issue was discussed with MN-CIT and MPD and both the IE Team and MDHR made it clear that future training cannot commence until final approval of the curriculum is granted through the process required by the Agreement.

The IE Team observed the 2025 CIT 8-hour refresher class and, unfortunately, the delivery of the training materials still had some of the same problematic issues that were identified during the IE Team's observations of the 2024 CIT 8-hour refresher class. Specifically, there was a distinct difference in the experience and instructional capabilities of some of the MN-CIT instructors. While some appeared to be very qualified and could deliver the curriculum appropriately, others struggled to achieve facilitated discussions with students in the classroom. This issue was raised with MN-CIT, and to its credit, it was responsive to concerns. The IE Team will continue to monitor this issue in the future. It should be noted that all the MN-CIT instructors are Mental Health Professionals and are experts in the training content. Some instructors may simply need to improve their classroom instructional skills. MPD has offered to allow them to attend their Instructor Development Course (IDC) free of charge.

While the overall content of the CIT training covered pertinent topics in a CIT Refresher, deficiencies included heavy use of PowerPoint and lecture formats as opposed to integrating other forms of adult learning techniques, including relevant videos to "bring to life" the topic being covered. Additionally, the absence of a law enforcement co-facilitator appeared to be a critical missing factor, as it can facilitate discussion among classroom participants. It is important to note, however, that the scenario-based training portion of the class, which uses professional actors, was exceptional. The scenarios are co-facilitated by both a sworn law enforcement and a clinician representative, which bring together important learning opportunities for practicing skills. The IE Team observed officers utilizing skills taught in the class.

During the IE Team's observation of the 2025 CIT 8-hour refresher class another serious issue was observed regarding the classroom behavior of some of the MPD personnel in

attendance. They created conflict in the classroom by challenging the curriculum being taught and complained about the IE Team and MDHR observing the class. This was brought up with the Commander of the Training Division, which led to creation of a "Ground Rules" (proper classroom behavior) statement, which the most senior MPD person in attendance was directed to read aloud prior to the start of the class. The IE Team discussed with MPD alternative ways to address the lack of professionalism in the classroom, but make no mistake, it is incumbent upon MPD leadership to solve this problem. The IE Team will continue to monitor this issue in the future when Use of Force training is scheduled.[4]

During this review period, MPD and the City Attorney's Office (CAO) requested a meeting with the IE Team and MDHR to discuss using scenarios with a behavioral health crisis component within the required Use of Force (UOF) Day-1 training curriculum. MPD and the CAO were concerned that due to extensive changes to the CIT policy, any scenarios created for the UOF training would not have all the policy updates included in the scenarios. They did not want a situation where the training would have to be redone later due to the curriculum not addressing all the CIT policy revisions.

To address the issue, MPD provided the IE Team and MDHR with the preliminary UOF training curriculum, including the CIT scenarios, and then gave the IE Team and MDHR a presentation on the CIT scenarios training objectives and how they intended to deliver the training. MPD also provided an overview of all three days of the UOF training and explained how topics are to be sequenced over the three days to improve the effectiveness of the training. The IE Team commends the MPD and CAO for identifying a potential problem and bringing it to the IE Team's attention before moving forward and possibly wasting valuable training hours in the process.

Misconduct Investigation Curriculum Under Development

The MPD has begun working with the IE Team on developing curriculum for major training courses such as the 40-hour Investigative Course to prepare IA, OPCR, and Human Resources investigators to professionally investigate police misconduct cases. This course will require extensive collaboration in the development of curriculum and the IE Team will update progress in the next semi-annual report.

Status of Engaging With Minors Training

MPD is still developing the Engaging with Minors policy and is coordinating its development to align with the Stops/Searches/Citations/Arrest policies related to adults. Given that the policy is still under revision, MPD has not trained officers based on the content of the updated policy. MPD understands it needs to finalize its policy, so it is training fully aligns with the revised policy and plans to do so before the end of Year Two of the Evaluation Plan.

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[4] To be clear, the IE Team does not object to MPD personnel sharing their candid views of the Department, the Settlement Agreement, and the IE Team's work. In fact, the IE Team has received, and welcomes, positive and negative feedback from officers, in meetings, at roll calls, and on ride-alongs. But there is an appropriate time and place for such feedback and doing so in a classroom setting can be disruptive to training efforts.

Supervisor/Leadership Training Still In Progress

MPD has begun developing a 40-hour New Supervisor Course that will be mandatory for all newly promoted supervisors to attend. This course will also require extensive collaboration in the development of the curriculum and the IE Team will update progress in the next semi-annual report.

Officer Support and Wellness and Early Intervention (Part 8)

Employee Health and Wellness Policy Updates are Still In Progress

During the review period, the MPD Health and Wellness Unit continued to meet biweekly with the IE Team to provide progress reports toward achieving the Agreement's goals and requirements. The IE Team considers this unit to be a highly functional team, dedicated to the mission of prioritizing health and wellness for the MPD. The biweekly meetings are effective and well organized, with MPD coming prepared with demonstrated progress.

During the review period, the IE Team reviewed the overarching Health, Wellness, and Safety policies, provided substantial feedback to the MPD, and participated in several workshop sessions with the Parties. MPD anticipates these policies can be finalized and approved before the end of the next reporting period. The MPD will then begin drafting SOPs on Health and Wellness related topics including Peer Support, Critical Incident Response, and Traumatic Incident Response.

Current Staffing for Wellness Unit is Insufficient to Meet Agreement Requirements

There was a recent change in leadership at the Commander level toward the end of this reporting period, as well as the retirement of one of the full-time dedicated sworn positions in the Unit. Additionally, as of March 31, 2025, there were only two dedicated full-time positions (1 sworn and 1 civilian) assigned to meet all needs of the department and manage the Agreement's Part 8 requirements. The IE Team considers this to be wholly insufficient for an agency the size of MPD and given the significant volume of work required for MPD to achieve compliance with Part 8 of the Agreement. MPD's latest projection for the filling of the Director of Wellness position was not expected to occur until 2026. The IE Team has strongly encouraged, verbally and in writing, the City and MPD leadership to prioritize increasing the unit's staffing, including expediting the hiring of a Director of Wellness which will be crucial to providing subject matter expertise, vision and overall direction of the unit. The remaining positions outlined in MPD's Employee Support Plan should also be filled as soon as possible, but the Director role is crucial.

New Clinical Services Vendor Selected

MPD and the City provided the IE Team with a draft RFP that provides clinical services outlined under ¶¶ 253; 257-264 of Part 8 of the Agreement. The IE Team provided feedback to the City on the RFP's requirements, and an interim contract was granted to a qualified organization that provides clinical services including individual, couples, and family therapy, wellness check-ins, critical incident response, peer support team development and oversight, and training services to the MPD.

MPD Progress on Peer Support Program

MPD reviewed the applications and selected 21 Peer Support members. The Peer Support Team provides confidential, one-on-one support to MPD employees navigating personal or professional challenges. Peer Support members are selected based on eligibility criteria including their personal and professional experiences, their ability to maintain confidentiality, provide empathy, and build and maintain trust. The team represents a diverse range of ranks, units, and experiences within the department, both sworn and civilian. By the end of the reporting period, 18 of the Peer Support members had completed the state approved peer support training provided by Wellness that Fits. The training is 32 hours and consists of nationally recognized Mental Health First Aid (MHFA), Applied Suicide Intervention Skills Training (ASIST) and additional peer support-specific training.

Employee Support Plan Revisions are Still In Progress

MPD submitted its updated Employee Support Plan to MDHR and the IE Team in February 2025. MDHR and the IE Team reviewed the updated Plan, and while a significant effort has gone into its development and revision, the IE Team has determined the Plan is not yet sufficient to meet the Agreement's requirements. The IE Team returned the draft Plan at the end of March with specific content requirements and requested changes that are expected to bring the Plan into compliance. The IE Team looks forward to reviewing a revised version of the Plan during the next reporting period so that the MPD can have a completed roadmap for achieving wellness-related requirements under the Agreement.

Facilities, Equipment and Non-Database Technology Plan Revisions are Still In Progress

The City and the MPD have also nearly completed the Facilities, Equipment and Non-Database Technology Plan, incorporating the IE Team's feedback. The Parties met in late March to discuss next steps, and the IE Team anticipates the Plan to be finalized and approved for compliance during the next reporting period.

The City has invested significant effort and resources into the development of the Plan and into beginning implementation in several areas. To monitor progress on the over 300 projects and task items outlined in the Plan, the City began developing monthly progress reports which are sent to the IE Team and MDHR highlighting the tasks completed that month and providing photographs of those tasks the City has marked as "complete." The IE Team will conduct its own on-site confirmation before determining compliance.

Additionally, to address IE Team concerns about reducing "siloing" and increasing collaboration among City entities (MPD, Property Management, etc.) the City/MPD has established an executive steering committee made up of key positions including leadership of precincts, property management, senior City leadership, senior MPD leadership, etc. Since the last reporting period, the committee has met three times and is finding the collaboration highly effective. The members of the committee should be commended for this effort as they continue to discuss improvements related to the implementation of the Plan and continue to meet quarterly to facilitate progress. The IE Team has requested

agendas, meeting minutes, and attendance records for these meetings to review for compliance during the next reporting period and for future committee meetings.

Early Intervention System Implementation Remains on Schedule

The IE Team continues to meet monthly with the MPD and the vendor to monitor progress on the Early Intervention System (EIS). A formal decision on whether to combine EIS personnel under the Wellness Unit has been an open question for several months. A decision on this prior to EIS Implementation is necessary so that there are clear roles and responsibilities established going forward.

The IE Team reviewed the EIS policy (as reported above in Part 2 updates) and provided extensive feedback. MPD anticipates the EIS policy can be finalized in the next reporting period so that EIS related training can be developed and delivered prior to the planned go-live date of the system.

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

The IE Team met several times with the Commissioner of Community Safety, Toddrick Barnette, to better understand the City's history with behavioral health response, its priorities, limitations and associated national best practices. The IE Team also met with the City's contracted provider responsible for Behavioral Crisis Response (BCR) services. Continued productive collaboration among all the relevant entities related to this topic will be important to meeting the needs of the community and the requirements of the Agreement.

Behavioral Health Response and Crisis Intervention Training Requires Further Improvement

During the review period, the IE Team reviewed and provided feedback on the updated CIT Refresher training. As stated in the Part 7 (Training) section of this report, MPD launched the CIT refresher training prior to the court approved time for the IE Team to provide formal comments back, which did not comply with the Agreement. This training was conducted and the IE Team observed it on January 24th. While overall the training was well done, there were several important components that should be modified. The training does an excellent job with scenario-based training, but there is room for improvement. The current training relies heavily on PowerPoint presentations and lecture format, and the IE Team provided this feedback in the prior iteration of the training as well. Further revisions should include additional training mechanisms to help with delivery. For example, using videos to help illustrate certain mental health symptoms or neurological responses, videos showing effective active listening or de-escalation strategies/tactics in law enforcement, simulation exercises (for example, hearing voices), and testimony from people with lived experience, among other mechanisms.

Based on the IE Team's observation of the training, there was little time spent covering the Critical Decision Making (CDM) model, which MPD uses as part of its UOF training and is important to Crisis Intervention training. This is a model common in law enforcement and should be included in the CIT training. The IE Team also notes that the training does not leverage a law enforcement/clinician co-facilitator structure, which is considered a best

practice that can lend greater credibility to the training, provide accountability on training topics during instruction and assist with "translation" of subject matter content by someone who understands law enforcement culture through personal experience.

The IE Team also informally observed substantial portions of the 40-hour CIT training, which is required to be attended by all new recruits. While this training curriculum has not yet been formally produced or reviewed, observing this training gave the IE Team a baseline for the training's strengths and areas for improvement. Overall, this 40-hour training session was excellent, and consistent with best practices. The training included a law enforcement co-lead, people with lived experience, and a panel of professionals representing community resources. It also utilized excellent scenario-based exercises and several highly relevant video examples, which should be considered for the refresher training as well.

Call Center Dispatchers to Receive Additional Behavioral Health and Crisis Intervention Training

To comply with ¶237 and ¶289 of the Agreement, the Minneapolis Emergency Communications Center (MECC-911 Call Center) must train dispatchers and their supervisors to identify, dispatch and appropriately respond to calls for service that involve individuals in crisis. Additionally, ¶289 requires a "behavioral health crisis response team to better address the needs of individuals experiencing a mental or behavioral health crisis." 911 call centers perform an essential role in providing these services, which are often under-appreciated. They are truly the *first*, "first responders." Compliance will require the City to implement the policies, protocols, training and capability for data collection and analysis necessary for its Emergency Communications Center to perform services in a manner that fulfills the requirements of the Agreement. As a step to that end, the MECC anticipates developing and delivering Crisis Intervention Training for telecommunicators during the next reporting period.

Monitoring and Enforcing MPD Work Hour Limits Under Agreement Requirements

Part 9, ¶290, of the Agreement requires MPD to establish daily and weekly work hour limits. During the review period, the MPD provided the IE Team with historical work hour data from January 1, 2022 – December 31, 2024, so that a baseline review of work hour patterns could be developed. The IE Team met with the City and with MPD finance division personnel to seek clarification on data definitions to work toward establishing a baseline review. During the next review period, the IE Team will coordinate with MPD to review and update its current policies regarding maximum limits on work hours to align it and any accountability measures that are needed to ensure adherence with Agreement requirements under Part 9.

The City's IT Department is in the process of implementing new scheduling management software for MPD that is expected to provide additional capabilities in how data can be reported and to provide administrative alerts for members that are approaching or have exceeded policy limits on hours worked (to include off-duty work hours recorded in the system). The IE Team will work with the City to ensure that the Agreement's requirements are being met.

During the next review period, the IE Team will coordinate with the Parties to develop a longer-term plan and system that can ensure MPD members are following the Agreement's requirements on work hour limits and what accountability measures are taken for those who continuously exceed these limits and supervisors who are approving hours that exceed these limits.

Accountability and Oversight (Part 10)

Revisions to Policies and SOPs for Misconduct Investigations are Still In Progress

Policy and SOP development continued steadily during this review period. A final draft of the IA and OPCR's SOP was submitted on March 17, 2025, while the 2-100 Accountability & Misconduct policies are undergoing revisions after incorporating feedback from public comment, internal reviews, the IE Team and MDHR. MPD has begun work on a draft comprehensive training plan aligned with the SOP, the 2-100 policies, and the Agreement. This training plan will include components for IA/OPCR investigators, academy courses, supervisory training, and department-wide education on policy and procedural updates.

During the review period, IA and OPCR kept the IE Team apprised of their progress. The Parties and the IE Team participated in multiple workshops aimed at refining SOPs and policies that will provide the foundation of investigative operations. In total, the IE Team joined at least eight collaborative sessions with representatives from MPD, the City, and MDHR to develop and revise the IA & OPCR Misconduct Investigation SOPs, which are now nearing finalization.

Revisions to the disciplinary matrix are in the early stages of the initial review process and are expected to require considerable effort to complete. This is a key foundational document for ensuring consistent implementation of accountability measures to ensure compliance with updated policies and training. The IE Team will remain engaged throughout this revision process to provide support and technical assistance.

The IE Team is aware of improper historical practices of MPD inappropriately referring misconduct cases for coaching, a form of non-disciplinary corrective action. MPD is currently in the process of revising its SOPs to establish specific criteria under which coaching can be recommended and the IE Team will review these revisions to ensure they conform with the requirements of the Agreement. During the next reporting period, the IE Team will also begin reviews of all cases referred to coaching to ensure they are consistent with new SOPs and policies.

Overview of the Misconduct Investigation Process

The IE Team has received questions from the community related to the nature of the case investigation process. To provide a better frame of understanding for topics related to accountability and oversight in MPD, the chart below summarizes the basic process of case investigation, from intake to the Chief's determination. Below the process diagram is a more granular description of each step in the process. This provides a useful framework for understanding the details of this report.

| Intake Phase | Investigation Phase | Panel Review | Chief's Decision |

- **Intake Phase:** Depending on the nature of the complaint,[5] IA or OPCR will collect relevant information from the complainant, and if appropriate, assign an investigator to open an administrative investigation into the complaint.
- **Investigation Phase:** The appropriate investigative entity investigates the complaint and produces an Investigative Summary Report. A supervisory review of the Summary Report occurs within 15 days of the Summary Report's completion.
- **Panel Review:** A panel consisting of five panelists (three civilian and two sworn) reviews the case, discusses the findings, and submits a recommendation on its merits to the Chief of Police for consideration.
- **Chief's Decision:** The Chief of Police may return the case to the investigative entity for additional investigation or issue a determination.

Steps of the Misconduct Complaint Process

The following table provides more information on the specific stages and timeframes related to investigations, as contemplated in the Settlement Agreement.

Steps of the Misconduct Complaint Process	Citations
Complaint is submitted by the complainant; Complaint is formally documented, filed, and assigned a tracking number	¶ 307
Non-anonymous complainants must be informed, in writing, of: (a) the receipt of their complaint, (b) the tracking number assigned to the complaint, (c) contact info for the investigator (if one was assigned already)	¶ 307
A signed complaint will be sought and secured as feasible and as detailed further in SA ¶ 308. Additionally, an assessment will be conducted to determine whether the complaint should be referred for investigation, mediation, to the MPD officer's commander for potential non-disciplinary corrective action, or dismissal with no further action required where appropriate and permitted. If an MPD officer agrees that they have violated MPD policy, there is also an expedited disposition process (where there is no investigation because the officer agrees to the discipline on the front end).	¶ 308, ¶ 317, ¶ 320
Investigators must: (a) complete their investigation, and (b) provide the Investigative Summary Report ("ISR") to their supervisor(s)	¶ 321, ¶ 327
Within 15 days of ISR receipt, the supervisory reviewer must: (a) review the ISR and investigative file, and (b) approve the ISR and investigative file, unless additional investigation is needed pursuant to SA ¶ 335	¶ 328, ¶ 335
Upon supervisory approval of the ISR, the ISR and investigative file "will be forwarded to a Review Panel" for deliberations and recommendations	¶ 328
No more than 30 days from the approval of the ISR, a Review Panel shall convene	¶ 328

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[5] In general, MPD Internal Complaints are the responsibility of MPD Internal Affairs to investigate. Complaints received from members of the public are the responsibility of OPCR to investigate.

Within 3 business days of the adjournment of the Review Panel, the Panel shall formally issue their recommendation by sending it to the Civil Rights Department	Ord. 172.40(c)
Within 7 days of the Review Panel recommendation, OPCR Director/IAD Deputy Chief will: (a) review the Panel recommendations, and (b) provide the MPD Chief with the Panel recommendation(s), the investigative file, and the ISR	¶ 329, Ord. 172.50(a)
Within 15 days of the MPD Chief receiving the above, the Chief may **EITHER** return the file for additional investigation **OR**, if that is not needed, then the Chief has a full 30 days to issue a determination finding for each allegation (unless such period is tolled by law). That determination will be documented in writing and maintained in the various locations detailed in SA ¶ 333	¶ 330, ¶ 333, Ord. 172.50(b)
The Appeals process begins within 21 days of the Chief's determination and is not detailed further in this timeline. Please refer to the Labor Agreement-Police Officers' Federation of Minneapolis for more details on the process.	CBA Art. 11, 12
Upon conclusion of any applicable grievance/appeals proceedings, or upon an employee's failure to timely appeal, and as permitted by law, MPD shall make disciplinary decisions "promptly available" to the public	Ord. 172.50(c), ¶ 381

OPCR Capacity Increased During the Review Period

The City and OPCR have placed a heavy focus on capacity building during this reporting period, which will determine both the pace and achievement of compliance. This is especially important for those paragraphs that include a timeliness element, such as ¶¶328, 329, 344, and 321 which require that investigations be completed within 180 days. Efforts include filling vacancies, retaining vendors, training to the standards laid out in the Agreement, and reducing misconduct complaint backlogs that have accumulated at each stage of the investigative process over time.

To strengthen structural support and better oversight, OPCR was reorganized into three units:

- Intake Unit: All budgeted positions filled
- Investigations Unit: Three vacant positions filled by May 2025; these are the final vacant positions that remain to be filled.
- Policy and Research Unit: All budgeted positions filled with the addition of a management analyst, dedicated to policy analytics; hired with a start date of April 21, 2025, that reports to the OPCR Associate Director.

To support OPCR's IT needs, a Business Data Analyst reporting to the Deputy Director of Civil Rights was hired during this reporting period. The department plans to add a Compliance and Quality Assurance Officer in the coming months to monitor OPCR's performance relative to the Settlement Agreement. This role will report to the Director of Civil Rights. These internal mechanisms of accountability and compliance show dedication to sustaining reform. Key staffing benchmarks reported by OPCR in this review period include:

- By March 2025, OPCR reported 18 budgeted positions with 4 vacancies (22% vacancy rate) as compared to in July 2024, when OPCR reported 17 budgeted positions and 8 vacancies (47% vacancy rate)

- OPCR's new Management Analyst starts in April 2025, and its remaining three Investigator positions will be filled in May 2025
- OPCR anticipates having all budgeted positioned filled by the end of May 2025

OPCR Efforts to Process its Historical Case Backlog During the Review Period
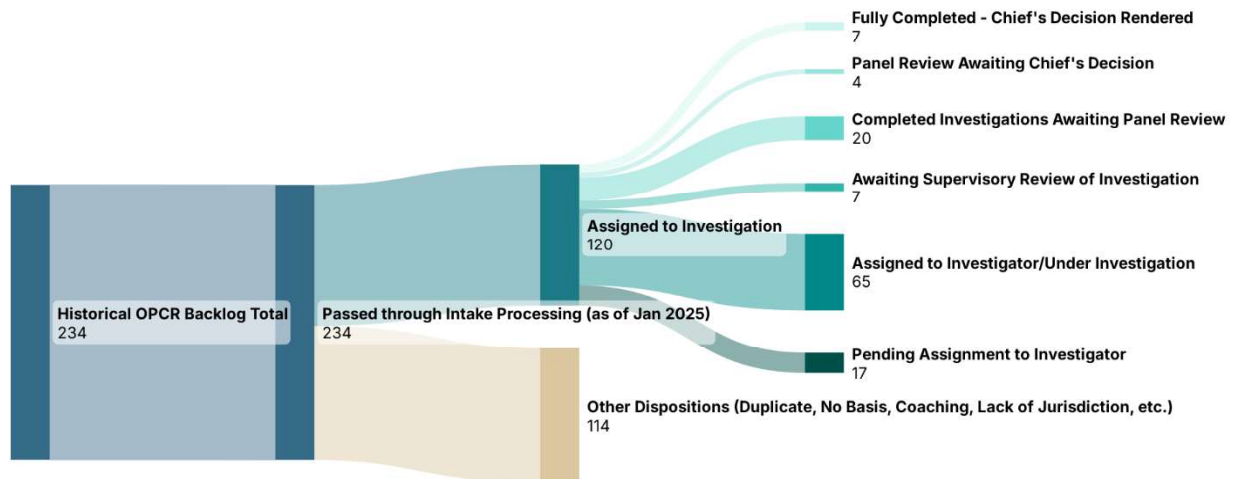
During the review period, OPCR focused on building more investigative capacity, which has led to the complete review of all backlog complaints as of January 2025. As documented in the IE Team's 1st Progress Review (for period ending September 2024) the historically backlogged cases for OPCR were stalled at the intake phase, due in part to the large volume of cases, the lack of personnel and resources to manage them, and organizational management issues.

In this first year, a principle focus for OPCR related to addressing its historically backlogged cases as detailed in the Evaluation Plan. For OPCR, "historically backlogged" cases means any case, that was over 180 days old as of May 2024. Under this criteria, the number of cases in the historical backlog totaled 234.

During the current reporting period, OPCR reported it was able to process all 234 historical cases out of the intake phase. Of these 234 cases, 120 were moved to the investigation phase, while 114 were not referred for administrative investigation due to the nature of the complaint being eligible for coaching, non-disciplinary corrective action, or was otherwise eligible for administrative closure (due to a lack of jurisdiction, failure to state a claim, or a duplicate complaint of an existing case).

During the review period, OPCR reported it was able to complete investigations into 33 of the 120 backlogged cases referred for investigation and submit them for a Panel Review to deliberate and make recommendations; however, as of March 31, 2025, 65 cases were still under investigation and 17 were still pending assignment to an investigator.

Status of Historical OPCR Case Backlog as of March 31, 2025

The OPCR Case Backlog Chart shows that, as of March 31, 2025, there were 7 historically backlogged cases that were fully completed (having received a determination from the
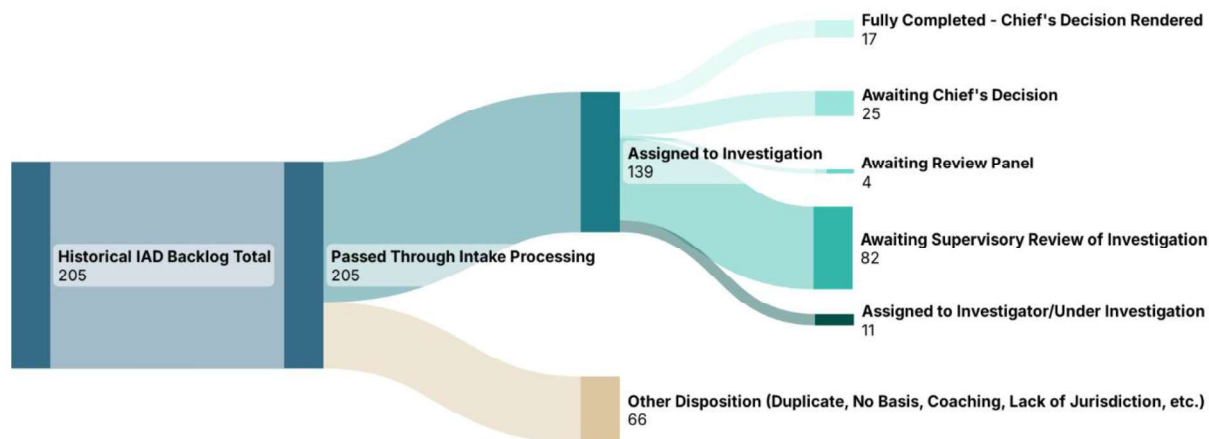
Chief), 4 were awaiting the Chief's decision, 20 were awaiting Panel Review, and 7 were awaiting supervisory review. The IE Team will begin to audit this data in the next reporting period and will audit the quality of cases at an appropriate time.

MPD Internal Affairs Efforts to Process its Historical Case Backlog During the Review Period

Historical backlog refers to open investigations that were at least 180 days old as of March 18th, 2024, the start of Year One. In future Progress Reports, the IE Team will ensure data is provided by IA (and OPCR) on the entire workstream in process. In this report, the primary focus of this section is the processing of historical backlog, which the IE Team believes is a critical area that must be prioritized to be effectively addressed.

Between October 2024 and March 2025, IA made progress in several key areas, including backlog reduction, policy development, training, and internal infrastructure improvements. IA developed and implemented a formal backlog plan in October 2024 where it was able to identify and prioritize 205 cases that fit the backlog criteria outlined above. The diagram below outlines the progress made on the historical backlog of these 205 cases in IA:

Status of Historical IA Case Backlog as of May 15, 2025

During the review period, IA was able to process all 205 historically backlogged cases through the intake process and identified 66 that were not referred for administrative investigation due to the nature of the complaint being eligible for coaching, non-disciplinary corrective action, or was otherwise eligible for dismissal (because direct evidence revealed no basis for the complaint, the complaint was duplicative of another active investigation, the complainant failed to state a claim that represented any policy infraction, or the case was cleared by exception because an existing policy exemption related to the action).

As of May 15, 2025, IA reported 46 of the 139 historically backlogged have been referred for an administrative investigation and have submitted them for Panel Review; however, as of May 15, 2025, 82 historically backlogged cases were still awaiting supervisory review and 11 were still under investigation. The IE team will begin to audit this data in the next reporting period and will audit the quality of cases at an appropriate time.

The City Has Completed an Outreach and Recruitment Plan for Appointing Members to the Community Commission on Police Oversight

During this reporting period, the Minneapolis Department of Civil Rights submitted an outreach and recruitment strategy to appoint a diverse group of community members to the Community Commission on Police Oversight (CCPO), as required by the Agreement (¶337, 338, 339). The strategy was developed in collaboration with the Office of Public Service Communications Department, the City Clerk's Office, the Office of Racial Equity, Inclusion and Belonging, and the City Attorney's Office. The Recruitment Plan was approved by the IE Team in March 2025.

From January 30 to March 16, 2025, the City conducted a recruitment campaign to fill seven open CCPO seats: Wards 1, 3, 6, 9, 11, 12, and one Mayoral appointment. Outreach efforts included attendance at the Community Connections Conference, flyer distribution across key neighborhoods, and engagement with community partners such as Minneapolis Mad Dads, Minneapolis Community and Technical College, Sammy's Avenue Eatery, Sabathani Community Center, the Minneapolis American Indian Center, and the Armatage Neighborhood Association. The City also used its website, social media, radio spots, and a press release to amplify the message. In total, the City received 44 applications.

City Has Expanded Panel Review Capacity

The City passed a temporary ordinance amendment that allows civilian Panel members to be drawn from either the CCPO or, through December 31, 2025, from the Minneapolis Commission on Civil Rights, provided they meet eligibility and training requirements. This provision will allow for more capacity to administer the Panel Review process for misconduct cases. The ordinance was unanimously approved by the City Council on March 27, 2025, and signed by the Mayor on April 3, 2025.

Seven Civil Rights Commission members have volunteered to participate in Panel Reviews pursuant to this temporary ordinance. Two members have already been fully trained and are ready to assist. The remaining five are in various stages of training, with at least three needing only one more training session. Work is underway to align training materials with the updated SOPs and the redrafted 2-100 Accountability & Misconduct policies. These materials will undergo the same review and approval process as the policies themselves.

IA Lacks Technologic and Staffing Capacity to Support Data Analytics on Misconduct

Due to limitations in the data reporting systems and practices in use by IA, MPD was unable to provide data that would allow for consistency with the same time periods as other data items and statuses of progress throughout this report. To provide consistency, the IE Team reports data for its Progress Reports as of the end of the review period, in this case, March 31, 2025. Given the inability of IA's current data system to generate data in this fashion, MPD was only able to produce an accurate status report on the date this report was finalized, May 15, 2025. The IE Team's observations of the way case status data must be manually updated each time a case moves to a new stage in the process clearly demonstrates the need for an updated case management system that allows for automation of status updates and dynamic reporting capability.

IA's data analytics capacity also appears to be insufficient to sustain the data reporting requirements of Part 11 of the Agreement and to support general analytics to aid in managing IA performance. Data requirements include providing information to the Quarterly Review Panel process, the verification and validation of misconduct data published on public dashboards, and annual reporting of misconduct related to use of force, as well as other administrative management items. The IE Team recommends the addition of another management analyst position like the one recently added to support OPCR data analysis.

Launch of Public Website for Information on How to File a Compliant

The City launched its first website dedicated to the complaint process for City employees seeking to file a complaint about the MPD sworn personnel, enhancing transparency and public access to information. Efforts to enhance the site are ongoing.

Investigative Training Delivered for IAD and OPCR Personnel

MPD reported that it has strengthened its supervisory practices within IAD by conducting regular case check-ins and oversight of interviews performed by new investigators. MPD delivered investigative training to all new IA civilian investigators, covering a wide range of topics including constitutional policing, use of force, BWC review, data systems, procedural justice, and scenario-based exercises.

All IA investigators (sworn and civilian) and leadership staff (case manager, lieutenant, and commander) also completed the FBI-LEEDA Managing and Conducting Internal Affairs Investigations course.

The IE Team has not observed these trainings but is working with MPD to develop misconduct investigation training that aligns with the requirements of the Agreement as outlined in Part 7 (Training) of this report. IAD and OPCR also conducted a joint training session for CCPO review panelists in December 2024.

Implementation of New Misconduct Case Management System is Still In Progress

The City and MPD continue to develop the requirements for the new case management system to support OPCR and IA misconduct investigations, with IA and OPCR attending biweekly working sessions and providing iterative feedback. The original timeline proposed by the vendor offered a June 2025 launch date; however, given the extent to which the accountability-related SOPs and policies have impacted the requirements for the system (and the extended process to workshop and revise these policies and SOPs), the timeline for launch of the case management system has been postponed until the end of September 2025. The IE Team will continue to participate in the biweekly meetings with the City/MPD and the vendor to monitor progress.

Data Systems, Analysis, and Transparency (Part 11)

City Has Completed the Data Systems Plan

In September 2024, the City submitted its first draft of the Data Systems Plan, as required under Part 11 of the Agreement. After completing a review of the draft Data Systems Plan, MDHR and the IE Team found the first submission to be non-compliant due to a lack of

specificity for implementation milestones, overall timelines, and budget requirements. The City requested technical assistance from the IE Team to specifically identify areas needing improvement. The City revised the Data Systems Plan based on this feedback and made subsequent submissions for review in January 2025 and February 2025, to include a full crosswalk/mapping of all data records requirements throughout the entirety of the Agreement. This crosswalk will be used by the IE Team and MPD/the City to validate each system of record that is projected to be responsible for managing and collecting data and documentation requirements throughout the Agreement.

The IE Team has assessed the updated Data Systems Plan documents as sufficient to meet the Agreement's requirements. The IE Team believes the Plan will be an effective roadmap to lead the MPD and the City in their efforts to modernize their IT environment. It will be essential, however, for the MPD to coordinate implementation and conduct user testing as new data systems are developed and deployed in the coming years. While the IT Department has the requisite experience and capability to serve in a leadership role in project management for the efforts outlined in the Data System Plan, successful completion of and full compliance with the Agreement's Part 11 requirements can be achieved only by leveraging MPD's user experience, operational knowledge, and by seeking and incorporating continuous feedback received in the process. These updated systems must not only be built but must also be effectively used by MPD members to achieve the stated outcomes and goals set forth in the Agreement.

Anticipated Improvements Outlined in Data Systems Plan

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

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

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

Further Improvements Required for Data Dashboards to Achieve Full Compliance

In March 2025, the IE Team was made aware of news reports that questioned the data provided in MPD's public facing dashboard related to Use of Force incidents. In response, the IE Team met with MPD and the City's IT Department on this issue to learn more about

the issue. As a result of that meeting, the IE Team has requested that MPD and the City IT Department consider redisplaying data categories that were previously reported under the earlier version of the dashboard. The IE Team also recommended that additional measures be taken to better explain data related to injuries and complaints of injuries by those subjected to force options. The IE Team will continue to review all dashboards going forward as new data systems are brought online to determine compliance with the Agreement's requirements.

Quarterly Review Panel Meetings are Generally Well Prepared, Despite Observed Data Reporting Challenges

Over the course of Year One, the MPD has conducted Quarterly Review Panel (QRP) sessions that included reviews of pedestrian stops data and discretionary search data. The IE Team observed the MPD team's extensive preparation for these meetings, which serves the purpose of encouraging meaningful and productive dialogue. This team sends all relevant materials to participants a week in advance and should be commended for its work, as this process will serve the QRP members well moving forward.

MPD also submitted a revised policy for the Quarterly Review Panel process during the review period. The IE Team provided an initial round of feedback to MPD on an early draft of this policy and met with MPD to talk through improvements. The IE Team has received an updated version and will restart collaboration with MPD on this policy during the next review period.

The IE Team also observed significant challenges in MPD's ability to report and analyze data effectively due to the deficiencies of MPD's data systems and the processes for how primary data on these topics are collected and reported by officers. With the implementation of newer systems and upgrades to existing systems underway, it will be important for MPD team members that support the QRP process to provide their requirements to the vendors responsible for implementation of data system upgrades. Equally important will be the need for MPD to provide ongoing and sufficient data analytics staff support as well as training for data analysts on new data systems so that they can effectively meet the data reporting and data review requirements outlined in the Agreement.

QRP Discussions about MPD Traffic Stops Raise Performance and Review Concerns

The IE Team observed the QRP discussion on discretionary searches where the MPD staff had prepared video reviews of officers' interactions with subjects who were pulled over due to traffic violations. In these separate instances, the officers were observed using nearly identical language where they were ordering subjects out of their vehicles, stating "case law gives me the right to order you out of the vehicle." Based on the IE Team's review of each encounter, either the officer did not have the constitutional right to do so (no reasonable articulable suspicion that a crime was being committed outside the traffic violation), or the officer failed to explain or provide a rationale to the subjects on why they were being told to exit their vehicles. In one instance, the driver of the vehicle did not have his driver's license on him, but the officer failed to explain why that required the driver to exit the vehicle. In another instance, the officer searched the pockets of a subject without any apparent

justification, found a large amount of currency, and claimed (incorrectly and inappropriately) that the individual required a federal permit to carry that amount of money.

While all the IE Team members observing the QRP identified and agreed with the problems with these stops, there was active disagreement among members of MPD Command Staff participating in the QRP as to whether officers did a good job or not during these encounters. MPD's discussion primarily focused on the positive aspects of the interaction, such as when officers de-escalated with the subjects. However, such de-escalation occurred *toward the end* of each encounter and the need for de-escalation was because of the officer's initial conduct. In other words, some of the Command Staff were focused on the wrong end of the encounter, praising officers for de-escalating situations they had unnecessarily and inappropriately initiated in the first place. It should be noted that the incidents in question all predate policies or trainings based on the Agreement's requirements on stops, searches, or uses of force, which are currently under development.

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

IE Team Reviews of Updated Policies

This list includes the status of each policy or group of policies that was worked on during the review period, which ended March 31, 2025.

Policies Approved During the Review Period:

- **Preface / Mission, Vision, Values, Goals**: The IE Team conducted in-depth reviews and provided suggested edits to the document. In addition, the IE Team met with the Parties to workshop this foundational document on multiple occasions. The final version of the Mission, Vision, Values and Goals was **approved** by the IE Team during this reporting period.
- **Use Of Force policies (5-300s, plus 7-801, 7-802, 7-804)**: The Parties conducted 10 workshopping sessions to collaborate on this group of 17 policies. In addition to these workshopping sessions, several other communications, including written feedback and phone calls on discrete topics, occurred during the reporting period to finalize these policies. These policies were officially **approved** by the IE Team before the end of this reporting period.
- **Crisis Intervention (7-803)**: The Parties conducted three workshop sessions on Policy 7-803. In addition, the IE Team participated in several communications and written reviews of the policy. Policy 7-803 was **approved** by the IE Team during this review period.

Policies & SOPs That Are Near Final Approval:

- **Emergency Medical Response (7-350)**: The IE Team provided informal feedback on this policy prior to MPD submitting it to the Parties for formal compliance review. As of the end of this reporting period, this policy is very close to approval. The IE Team's comments have been resolved as of the end of this reporting period, and MDHR was still evaluating the policy.
- **Non-Discriminatory Policing and Procedural Justice (5-104 and 5-109)**: The IE Team and MDHR have provided written feedback on several iterations of both of these fundamental policies. Both policies are nearing finalization. The IE Team's comments have been addressed satisfactorily by MPD. As of the close of the reporting period, MDHR was still evaluating the policy.
- **Health, Wellness & Safety Policies (3-500s)**: The IE Team provided informal feedback prior to the three workshopping sessions that took place amongst the parties to work on these policies. At the end of this reporting period, MPD submitted these policies for a formal compliance submission. The IE Team anticipates these policies to be final within a few weeks after the end of this reporting period.
- **IA & OPCR Misconduct Investigations SOPs**: The IE Team participated in several informal working sessions with MPD and the City to discuss and craft solid drafts of

these important investigative procedural manuals. After that, the IE Team participated in three additional workshopping sessions with the Parties to continue work on these comprehensive SOPs. At the end of the current reporting period, the IE Team reports that MPD and the City have made extensive progress on drafting these investigations SOPs and are nearing finalization of these documents.

- **Body Worn Cameras and In-Car Cameras (4-223)**: The IE Team conducted an extensive review of MPD's draft of 4-223 and worked collaboratively with MPD to make updates to this policy. MPD submitted the policy for formal compliance in March 2025. Additional edits to clarify instructions to officers and supervisors regarding BWC and ICC usage requirements are anticipated, but we expect the policy to be approved within a few weeks of the close of this reporting period.

Policies and SOPs Under Development:

- **Stops, Searches, Citations, and Arrests policies (9-100s, 9-200s, 9-300s)**: The Parties participated in five workshopping sessions on this group of policies (plus an additional workshopping session on a topic related to 9-300). While significant progress has been made during this reporting period, the Parties will continue to develop this massive policy project at the start of the next reporting period.
- **Accountability and Misconduct policies (2-100s)**: The IE Team reviewed and provided feedback on the 2-100s policies during this reporting period. The Parties began workshopping sessions on these policies during this reporting period and will continue revisions after approval of the IA & OPCR Investigations SOPs.
- **Early Intervention System (2-203)**: The IE Team sent multiple iterations of extensive written feedback to MPD on drafts of the Early Intervention System (EIS) policy and met with MPD to discuss the IE Team's feedback. The IE Team expects that MPD will send an updated version of the EIS policy during the next review period to commence the workshopping phase of the EIS policy development.
- **Disciplinary Matrix**: The IE Team conducted informal reviews of drafts of the Disciplinary Matrix during this reporting period. The IE Team expects that MPD will send an updated version of the Disciplinary Matrix during the next review period and commence the workshopping phase for the Matrix.
- **Recruitment and Training policies (2-500s)**: The IE Team conducted an in-depth review of these policies and provided written feedback to MPD. The IE Team has participated in multiple informal sessions with MPD to discuss the feedback.
- **Field Training Officer Program SOP**: The IE Team provided extensive written feedback on this SOP to MPD. The IE Team has participated in multiple informal sessions with MPD to discuss the feedback.
- **Quarterly Review Panels**: The IE Team provided an initial round of feedback to MPD on an early draft of this policy and met with MPD to talk through improvements. The IE Team has received an updated version and will restart collaboration with MPD on this policy during the next review period.
- **Body Worn Camera Activation Checks SOP**: The IE Team reviewed the preliminary draft of the SOP that provides guidance to supervisors and the Implementation Unit

members in conducting BWC activation reviews. After updates to the BWC and ICC policy (4-223) are completed, the IE Team will re-review the SOP and provide any suggested language edits to ensure that it properly conforms with policy. The IE Team anticipates approval of the SOP before the end of the next review period.

- **Engaging with Minors (EWM)**: MPD submitted draft versions of these policies along with the SSCA policies. During this reporting period, the parties focused attention on the SSCA policies and not on the EWM policies. This is because the SSCA policies, once approved, will establish how officers are supposed to engage with adults. Once those guidelines are final or near final, MPD will be better situated to establish what additional protections and considerations that will need to be included in EWM policy guidance. The Parties are expected to restart work on the EWM policy in earnest once the SSCA policies advance closer to a final product.

IE Team Community Outreach Efforts

Public Information Sessions

The IE Team conducted three public sessions during this review period (¶407). These sessions focused on different elements of the Agreement and how the IE Team makes its assessments. They also provided opportunities for interested members of the community to ask questions in a robust Q&A. Meetings in this reporting period have focused on policy and training updates as part of the "foundational" steps in the Agreement process. To best engage with the Minneapolis community, locations for community meetings have been held in different precincts (thus far: precincts 2, 3, and 4). MPD's Implementation Unit Community Engagement team provided key assistance with outreach efforts including in-person neighborhood outreach and introductions to community organizations.

These meetings have seen high attendance and robust engagement from members of the community, local organizations, City Council, and local news, highlighting the ongoing high public interest in the Agreement process. These sessions are recorded and are available as follows:

- Video from March 2025 Meeting at Ukrainian American Community Center

- Video from November 2024 Meeting at Sabathani Community Center

- Video from November 2024 Meeting at North Community High School

In addition to the public sessions required by the Agreement, the IE Team facilitated meetings with community groups and observed neighborhood and community space visits led by MPD's Implementation Unit community engagement team. The IE Team also participates in weekly meetings with the Office of Community Safety's communications team as well as the MPD community engagement team.

Community Map and Implementation Liaison Council

The IE Team also continues to build out a Community Map which identifies organizations involved in policing, their mission, and their connections to other Minneapolis organizations.

The IE Team encourages organizations to submit information via the IE Team's Community Map Questionnaire for incorporation into the map.

The IE Team is in the process of selecting a Community Partner. At the time of drafting this report, applications had closed. However, the application form and more information about the role can be found here. The Community Partner will provide key support to outreach and ensuring continuity in engagement. The IE Team recognizes the crucial importance of continuity and access to information for the community, which is why the IE Team is planning to establish an Implementation Liaison Council (ILC) made up of members of local community organizations. Size and selection criteria are being determined, but interested organizations are encouraged to contact the IE Team via the IE Team website and to provide their information on our Community Map Questionnaire. The ILC will provide a further level of engagement (in addition to the Agreement's required public sessions) with the aim of educating and empowering community members and organizations. Both the Community Partner and ILC are expected to be finalized/operational during the next reporting phase.

Questions about the community map, the local engagement partner, or the ILC can be submitted through the IE Team website at www.elefamn.org.

The IE Team also wishes to express appreciation to the various community members, community groups, as well as members of CCPO, MPD employees (officers and supervisors) who have spent significant time engaging in the policy feedback process. As a part of the IE Team's review and assessment of policy drafts, the IE Team reviews all the feedback received by MPD from these various stakeholders to verify that MPD is considering the feedback as required by the Agreement. In cases where the IE Team identifies constructive feedback that MPD has not incorporated into policy, the IE Team coordinates with MPD on the feedback to explore whether they can incorporate it or a similar version of it so they can be responsive to community (or officer) input.

The IE Team is aware that community groups providing substantive feedback are eager to see how their feedback has been applied. Now that MPD has received official approval on significant policies – to include Mission, Vision, Values, Goals; Use of Force; and Crisis Intervention – the IE Team expects MPD to publicly post the finalized versions of policy updates that have been approved.

It is important for the Minneapolis community to be aware that policy approval is only the first step in the implementation process. Before these policies become active, and officers can be held accountable, MPD must train on the new policies. For example, the newly approved Use of Force Policy suite will not become official MPD policy until after the MPD's members have received the in-person training on these updated rules and guidelines. The IE Team will continue to provide updates on the process for curriculum development and delivery of training in future progress review reports.

Finally, the IE Team is in the planning process for conducting the community and MPD member survey required under the Agreement.

IE Team Engagement with MPD Personnel and City Staff

The IE Team continues to meet regularly with City Department heads and City personnel who play a direct role in implementing the requirements of the Agreement. This includes members of the City Attorney's Office, Department of Civil Rights, IT Department, Property Services, and Emergency Communications. These meetings continue to be productive and City employees demonstrate a commitment to cooperate and fully implement the Agreement. The IE Team will continue to engage in a broad-based strategy with all City partners to support continued engagement in the implementation of the Agreement's requirements.

Members of the IE Team continue to meet with members of MPD at all levels during monthly site visits and in virtual meetings. During the review period the IE Team met regularly with various members of MPD's command staff, officers and their supervisors at roll-calls and participated in ride-alongs, the Police Federation at their office, and in officer focus groups. In these encounters, the IE Team attempts to gauge MPD members' knowledge and understanding of the Agreement and the pending Federal Consent Decree.

While the feedback provided from MPD personnel during this process and summarized in this section is not the result of a scientific survey of officer sentiment, the IE Team does believe it is a fair characterization of topics and concerns expressed during the review period, given the frequency and consistency observed by the IE Team across many interactions. The IE Team recognizes and acknowledges that these views may not be representative of all MPD members and that more scientific survey methods (as required under the Agreement) will be used to more accurately describe the overall sentiment of MPD personnel who respond to such surveys; nevertheless, the IE Team believes it is important to summarize and report on these interactions with officers through its Progress Review reports. The IE Team also communicates such feedback topics to the Parties as appropriate.

The IE Team notes that it is clear MPD officers are experiencing an organization undergoing significant change. Understandably, they are seeking more clarity on next steps, general direction, additional communication from leadership, and, conversely, expressing frustration with the lack of clarity of changes underway. Organizational change management requires continuous, purposeful communication from leadership to ensure employees are accepting and supportive of culture change.

Many members with whom we spoke appeared to lack a comprehensive understanding of the Agreement but were keenly aware of perceived policy restrictions that did not exist prior to the Agreement. Across all precincts, some members expressed frustration and to some degree, anger for no longer being allowed to utilize certain enforcement tactics that other jurisdictions may be using, while being compelled to follow rules, policies and protocols that may not be required in policy for other jurisdictions.

Officers continued to be critical of their working conditions, primarily the conditions of precinct stations and vehicles, which in certain instances the IE Team can confirm are in a poor state. The IE Team regularly pointed to the City's Facilities Plan and cited work that is being done across the agency to fulfill the city's commitment to improving officers' work

environments. Although some officers and supervisors acknowledged the repairs and improvements in some precinct stations, their frustration and skepticism about leadership's concern about their working conditions remain high. Personnel shortages and the conditions of precinct stations and vehicles remain the top concerns and frustrations expressed by MPD members the IE Team encountered.

Most of the complaints were made by tenured officers, while many of the newer officers were either silent or expressed approval of the new policies. Many officers expressed distrust of the Early Intervention System, stating that it would be another tool the Department would use to "spy on officers" or "weaponize" against officers. The IE Team believes this belief reflects a lack of understanding of the purpose and benefits of a fully capable EIS and highlights the need for the City and MPD to develop a strategic communications plan for this topic as soon as possible, given the timeline for EIS implementation is scheduled before the end of 2025.

Officers across all precincts also had questions about the new Use of Force policy and some had questions about their authority (or a perceived lack of authority) to engage in vehicle and foot pursuits. The IE Team believes that once training on these topics is completed, it will aid in providing clarity on these topics.

More recently, MPD members expressed concern about the pending federal Consent Decree's requirement for Unity of Command which would bring MPD to a consistent scheduling model for its patrol officers and supervisors. This is very different from its current model, which allows for more flexible accommodation in scheduling preferences. This was the concern that was most frequently expressed by MPD members during the review period, as it is perceived as a significant benefit that differentiates MPD from neighboring jurisdictions.

Nearly everyone the IE Team encountered in patrol precincts continued to express frustration and anger with the disciplinary process and what they perceive as the inconsistent application and handling of discipline. Members are aware that the Department's disciplinary matrix is under revision but have expressed concern that rank and file officers have not been included in the revision process.

Workforce shortages and officer safety concerns related to the lack of available staffing remain top-of-mind concerns for MPD rank and file, which was consistent across all precincts and site visits.

There were more questions about the Agreement and pending federal Consent Decree; however, the questions were mainly requests to explain:

- The difference between the Agreement and the pending federal Consent Decree,
- Compliance vs. non-compliance,
- Enforcement of non-compliance,
- What can the IE Team compel the Chief and the police department to do,
- What can the IE Team compel the City to do?

The IE Team understands and appreciates the stress, uncertainty, and general anxiety that the reform process can generate. Several members of the IE Team have experienced this process first-hand, as monitors and as those who have been monitored. While the IE Team firmly believes that the Department and its members will emerge stronger and become more effective as they go through the reform process, for those for whom this process is new, the benefits can be difficult to envision. The IE Team will continue its efforts to make its members available to MPD personnel through additional site visits and group discussions to explain the process and how it will affect the Department. The IE Team encourages the MPD leadership to continue doing the same. The manner and frequency with which messages about this process are delivered from City and MPD leadership will greatly influence how the MPD's members will perceive, experience, and engage in the process.

3. Expected Progress for Next Reporting Period

In this section, the IE Team is reporting on the expected progress for the next reporting period and the overall progress achieved related to the implementation goals outlined in the Evaluation Plan approved by the Court in September 2024.

The IE Team uses the following categories to describe the state of progress for management goals (as of the end of the review period):

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

The IE Team uses the following categories to describe the state of progress for policy revision goals (as of the end of the review period):

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

- **Not Yet Started:** MPD/the City have not yet begun to actively coordinate with the IE Team to submit the stated policy (or policies) for initial review.

The IE Team uses the following categories to describe the state of progress for training development and delivery goals (as of the end of the review period):

- **IE Approved:** MPD/City have developed and delivered the stated training goal, which has been observed by the IE Team, who have determined such training meets the requirements of the Agreement.
- **Completed but Not IE Approved:** MPD/City have developed and delivered the stated training goal, which has been observed by the IE Team, who have determined such training does not meet the requirements of the Agreement.
- **Still In Progress:** MPD/City are either still developing the curriculum or in the process of still delivering the stated training goal, and the IE Team has not yet been able to make a determination on its status.
- **On Track:** MPD/the City have not yet begun to actively coordinate with the IE Team to provide status on the goal; however, based on the overall timeline of the goal and the IE Team's observations regarding capacity for MPD/the City to achieve the goal, they remain on track to completing the goal before the target date.
- **At Risk:** MPD/the City have not yet begun to actively coordinate with the IE Team to provide status on the goal; however, based on the overall timeline of the goal and the IE Team's observations regarding capacity for MPD/the City to achieve the goal, they are not expected to complete the goal before the target date.
- **Postponed:** A mutually agreed upon revision of the expected target date which can allow for the reprioritization of the stated training goal to be achieved later.
- **Not Yet Started:** MPD/the City have not yet begun to actively coordinate with the IE Team to begin working on a stated training goal because the underlying policy relevant to that training has yet to receive approval from the IE Team.

The IE Team uses the following categories to describe the state of progress for the IE Team's audit goals (as of the end of the review period):

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

Status of Year 1 Implementation Goals

Below is the summary of the Year 1 Implementation Goals outlined by the IE Team's in the Evaluation as of the end of the review period (March 31, 2025).

Status of Year 1 Management Goals

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

Status of Year 1 Policy Revision Goals

Status	Policy Revision Goal / Topic Area
Approved by IE	Mission/Vision/Values & Goals
Approved by IE	Use of Force
Near IE Approval	Non-Discriminatory Policing
Near IE Approval	Body Worn Cameras/In Car Cameras
Near IE Approval	Officer Health, Wellness & Safety
Near IE Approval	SOPs on Internal Affairs and OPCR procedures
Still In-Progress	Internal Affairs and OPCR
Still In-Progress	Stops, Searches, Citations, and Arrests
Still In-Progress	Field Training Officers
Still In-Progress	Early Intervention System
Still In-Progress	Disciplinary Matrix
Still In-Progress	Quarterly Review Panels
Postponed[6]	Engaging with Minors

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

Status of Year 1 Training Development and Delivery Goals

Status	Training Development and Delivery Goal / Topic Area
Completed	MPD Completion of first Annual Master Training Plan and Training Needs Assessment
Still In Progress	Engaging with Minors
Not Yet Started[7]	Supervisory/Leadership Training
Completed but Not IE Approved [8]	Crisis Intervention Refresher Training

As these tables demonstrate, MPD has not achieved several of the planned goals for Year One of the Evaluation Plan. While this may be disappointing in some respects, any judgment of progress must consider several facts. First, MPD has accomplished a considerable amount of work that is not necessarily reflected in these discrete goals. MPD's inability to meet all Year One goals was not due to a lack of commitment or diligence; rather, there were a series of constraints that the IE Team observed over that past year that were found to hinder the process. These constraints included:

- **Capacity challenges:** MPD and the City were not fully staffed at the beginning of year one, and they continue to face staffing challenges overall. MPD and the City are, however, continuously creating new positions and hiring personnel to confront these challenges. Significant progress was observed where there was intentionality by leadership to make sure the right capacity was in place with the right support and tools. There were substantial challenges and setbacks where that same intentionality did not exist.

- **Competing priorities**: Many of the MPD members and City personnel have been newly tasked with responsibilities that are essential to advancing the reform process yet are required to maintain many or all their original duties as well. This can result in MPD members and City personnel having to balance competing responsibilities. As MDP and City leadership develop more effective change management and project management skills, these personnel will be able to better manage competing priorities while still continued to make progress on implementation of the Agreement.

- **Delays in contracting external support:** It has also taken longer than expected to retain third-party vendors and, when necessary for their work, clear their personnel through the background process. When additional resources have been available, they have helped the City and MPD complete tasks more rapidly and effectively.

- **Acclimating to new practices:** The IE Team recognizes that there also has been a steep learning curve for MPD and City personnel, in that they can be tasked to do things they may have no prior experience doing. In fairness to the MPD and the City, the review, comment and approval process for policies and training curriculum by

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

[8] See Section 7 (Training)

the IE Team and MDHR can be a time-consuming process. In the final analysis, however, it is in everyone's best interest for the work to be *right,* not rushed.

The IE Team knows from its experience that if the City and MPD can remedy these constraints, there will be a positive impact on advancing implementation efficiently and effectively.

Status of Year 2 Implementation Goals

Below is the summary of the Implementation Goals outlined by the IE Team in the Evaluation Plan for the second year of monitoring. Goals established in the Year 1 section that were not achieved by the end of this review period will be carried over into Year 2, which ends March 17, 2026:

Status of Year 2 Management Goals

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

Status of Year 2 IE Team Audit Goals[9]

Status	Audit Goal / Topic Area
Not yet started	**Audits of Non-Discriminatory Policing (& Procedural Justice)**
Not yet started	**Audits of De-Escalation / Peer Intervention**
Not yet started	**Audits of Misconduct Investigations**
Not yet started	**Audits of Uses of Force**
Not yet started	**Audits of Stops/Searches/Citations/Arrests**
Not yet started	**Audits of Engaging with Minors**
Not yet started	**Audits of Crisis Intervention Response**

Status of Year 2 Policy Revision Goals

Status	Policy Revision Goal / Topic Area
Approved	**Crisis Intervention**
Still In-Progress	**Critical Incidents**

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[9] Given the timelines for auditing MPD performance on the topics listed in this section are dependent on updating of policies and department-wide trainings on updated policies being completed, the IE Team has not yet begun audit activities. Once a department-wide training on a specific topic has been completed and between 6-12 months have elapsed, the IE can begin conducting audits related to that topic.

Still In-Progress	**Supervisor Duties/Responsibilities**
Not yet started	**Performance Evaluations**
Not yet started	**Social Media Use**

Status of Year 2 Training Development and Delivery Goals

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

4. Status of Compliance with Agreement Requirements

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

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

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

Compliant. All material elements of the requirement (paragraph or Part) have been sustainably implemented.

Partially Compliant On-Track. One or more material elements of the requirement have been sustainably implemented and MPD is progressing toward compliance consistent with this Implementation Plan, as may be modified by the Parties

Partially Compliant Off-Track. One or more material elements of the requirement have been sustainably implemented but MPD is not progressing toward compliance consistent with the Implementation Plan, as may be modified by the Parties.

At Risk. The status indicates that MPD is facing the prospect of either not making further progress or becoming non-compliant.

Non-compliant. No elements of the requirement have been sustainably implemented.

Not yet measured. The IE Team has not yet assessed compliance with the requirement.

Not applicable. This would apply to requirements that have been eliminated, rendered moot, or are no longer operative.

The City and MPD are still in the foundational phase of the reform process. As a result, the IE Team's process for compliance assessment has only just begun, and therefore a significant majority of paragraphs remain in the status of either "Not yet measured" or "Not yet compliant," given there are a host of preliminary steps and action items that must be completed before a compliance determination can be made. However, given the requirements of paragraph 413 of the Agreement, the IE team will report on paragraphs that achieve a rating of compliance or partial compliance that occur during the review period. These paragraphs are outlined below (listed by Part and Paragraph number):

Compliant Paragraphs:

Part 4 (Use of Force):

- **Paragraph 59a** refers to the requirements in the Use of Force policy to provide general guidance of the value of the sanctity of life, dignity of all people, the standards for the authority to use force, duty to de-escalate, duty to intervene, and duty to use tactics to avoid the necessity of force. **Paragraph 59b** requires the Use of Force policy to clearly define and describe force options and/or the weapon and circumstances when force is appropriate and consistent with resistance types, and circumstances when force options are prohibited. The IE Team reviewed the newly approved use of force policies and have determined they are compliant with these requirements. Paragraph 59c and 59d have not yet been addressed with an approved policy.

Part 8 (Officer Support and Wellness):

- **Paragraphs 254 and 255** refer to the MPD's requirement to complete needs assessments related to employee wellness and the employee support plan. The IE Team reviewed these assessments and have determined they are compliant with the Settlement Agreement's requirements.

Part 10 (Accountability):

- **Paragraph 338** refers to the City's requirement to develop a recruitment and outreach strategy for CCPO. The IE Team reviewed the strategy and has determined it is compliant with the Settlement Agreement's requirements.

Part 11 (Data Systems, Analysis, Transparency):

- **Paragraph 361** refers to the MPD's requirement to an assessment of MPD's data management technology (which informs the Data Systems Plan). The IE Team reviewed this assessment and have determined it is compliant with the Agreement's requirements.

Partially Compliant – On Track Paragraphs:

Part 4 (Use of Force):

- **Paragraphs 60, 61a-b, 62, 64a-c, 65, 67, 68, 69, 71b-c, 72a-c(v), 73a-b, 74a-c, 75, 76, 77, 78, 81a-c(iii), 82c, 83, 84, 85, 88, 89, 90, 91a-h, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 109c-e, 109k, 109p, 112:** With the approval of the Use of Force policy suite, the IE Team now considers the paragraphs listed above from Part 4 as Partially Compliant – On Track, given that each deals with a topic that has been sufficiently included in the approved policy. Development and delivery of UOF training on this policy is anticipated during the next review period. MPD members must be trained and assessed for accountability to the policy before these paragraphs can be considered Compliant.

Part 6 (Body Worn Camera):

- **Paragraphs 172, 173:** MPD is required to maintain a BWC program and provide all patrol officers with BWCs to wear during their shift. This policy and program existed prior to the Settlement Agreement, which is why these requirements are considered partially compliant. Revisions and updates to the BWC policy are still in progress and will need to be approved, trained, and assessed for accountability before these paragraphs can be considered Compliant.
- **Paragraph 178:** MPD/the City is required to identify, repair and replace any in-car camera that is malfunctioning within 30 days of an officer's report of such an outage. Based on a review of documentation provided by the City and MPD, they were able to demonstrate their ability to achieve this requirement for 2024. The City is also using a web-based task request and management platform to handle this item specifically and provide future documentation for assessment. If MPD/the City can continue to demonstrate adherence to the requirement in 2025 and provide a mechanism to report any future outages, this provision could then be assessed by the IE Team as compliant.

Part 8 (Officer Wellness and Support):

- **Paragraphs 246, 247, 248:** MPD is required to complete an initial assessment of the conditions of facilities and equipment, and the results of the initial assessment should inform the development of the Equipment, Technology, and Facilities Response Plan. While MPD and the City have completed a sufficient initial assessment, periodic reassessments of equipment, and annual reassessment of facilities are still required under the agreement before the IE team can assess these paragraphs for compliance. In addition, the Response Plan is still under development, but given the level of progress MPD and the City have made on the executive steering committee process, the IE Team has assessed these paragraphs as Partially compliant – on track.

Part 11 (Data Systems, Analysis, Transparency)

- **Paragraphs 362 and 363:** MPD is required to complete a Data Systems plan to address the deficiencies outlined in the assessment process required from paragraph 361 and to satisfy all the data requirements set forth across the Settlement Agreement, either through the planned implementation of new systems or upgrades to existing systems. The IE Team has reviewed the Data System Plan and approved is contents as satisfying the overall requirement; however, implementation of the plan in accordance with the plan's timelines is still required to achieve a rating of compliant for paragraph 362. In addition, the City/MPD must demonstrate to the IE Team that a fully capable records management system has been implemented as outlined in paragraph 363 before that it can be considered compliant.

All other paragraphs[10] not outlined above are either "**Not yet compliant**" or **"Not yet measured."** Before the end of the next review period, the IE Team expects to publish a web-based, interactive dashboard that will provide updated status and full description of progress for every paragraph of the Agreement.

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[10] Note: paragraphs that are listed as "Objectives" or "Guiding Principles" throughout the Settlement Agreement do not receive compliance ratings given requirement they are treated as non-enforceable under paragraph 7 of the Agreement.

5. Technical Assistance Provided by the IE Team During review period

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

- Informal advice and guidance to MPD in the policy drafting process prior to formal submission for a compliance determination
- Direct assistance in redrafting BWC policies for compliance with the Agreement
- Participation in technology demonstrations to provide advice on system requirements for:
    - Use of force QAR form for Force Investigation Team
    - IA/OPCR intake form for new case management system
    - Scheduling software to replace legacy MPD systems used to manage personnel (which will integrate with early intervention system).
- Participation in regular status meetings with MPD and City to provide advice on:
    - IT implementation strategies and best practices
    - Misconduct investigations
    - Employee wellness
    - Police training practices
    - Mental and behavioral health response continuum

Conclusion

Institutional transformation is invariably a long and labor-intensive process. The focus of this first year, continuing into the next, has been what the IE Team described in its Evaluation Plan as the foundational phase of the implementation process. MPD and the City are continuing to lay a solid foundation that will be needed to support sustained implementation of the transformation contemplated by the Settlement Agreement; however, more work will be needed to achieve all the goals set forth in the Evaluation Plan's Year One and Year Two goals. The progress made thus far is attributable to the diligent, hard work of MPD and City personnel tasked with implementing these mandates. Each day, they have demonstrated their appreciation for the importance of their task and responsibility to deliver results to the Minneapolis community. The IE Team is honored and privileged to work and provide support to them in this endeavor.

In the coming years, the IE Team anticipates that further changes and improvements in MPD's performance will begin to become more apparent to the public and to MPD members, especially as new policies are finalized and trainings for these updated policies are delivered. Although there are challenges ahead and risks to successful implementation, based on the IE Team's observations of the efforts made by MPD and the City during the past two reporting periods, the IE Team can confidently report that MPD and the City are headed in the right direction, and continued progress is expected in the months and years ahead.