MINNEAPOLIS POLICE DEPARTMENT

SPECIAL ORDER

BY ORDER OF THE CHIEF OF POLICE

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TO: Distribution “A”			RETENTION DATE: Until Rescinded
SUBJECT: **Manual Revision – Chapter 2-700 Compliance Processes 2-701 Compliance Reviews and Audits**			APPROVED BY:

MP-8806

Introduction:

Effective with the issuance of this Special Order, Section 2-701 of the MPD Policy and Procedure Manual shall be added as follows:

2-701 Compliance Reviews and Audits

(xx/xx/xx)

I. Purpose

The Minneapolis Police Department (MPD) conducts compliance reviews and audits of the Department’s operations to:

- Promote transparency.
- Improve operations.
- Strengthen public trust.
- Enhance accountability.
- Support policy adherence.
- Foster continuous improvement.

The purpose of this policy is to provide clear guidelines and expectations for conducting compliance reviews and audits within MPD’s Implementation Division, to ensure they are objective, reliable, replicable, and effective.

II. Policy

MPD is committed to conducting regular and transparent Compliance team assessments. The process is intended to serve as a constructive mechanism to promote learning, support corrective actions, and advance Departmental reforms; it is not intended to be disciplinary.

A. The Compliance team within the Implementation Division is responsible for conducting these assessments of MPD, unless the Chief specifically assigns another unit to conduct them.

B. This policy applies to all members of the Compliance team and to anyone assisting with conducting a review or audit by the Implementation Division, and outlines the procedures that members shall follow when conducting Compliance team assessments for the Implementation Division.

III. Reporting Compliance

A. Exemption

Because the review and audit process is intended to serve as a constructive mechanism to promote learning, support correcting behavior, and advance Departmental reforms, and is not intended to be disciplinary, members of the Compliance team are exempt from the duty to report (P&P 2-101), subject to the following conditions:

1. This exemption applies only to behavior or conduct identified during Compliance team assessments conducted by the Implementation Division. It does not exempt the members from the requirements of P&P 2-101 in other situations.

2. This does not affect the processes for complaint receipt and investigation by Internal Affairs (P&P 2-104).

3. Individual violations of levels A and B of the corrective action matrix will be referred to the direct supervisor of the member to address the violation.

    a. Repeated individual violations represent a pattern and will be addressed as described below.

4. The Compliance team shall notify the Internal Affairs of:

    - Any findings or observations of a policy or procedure violation that falls within levels C to G of the corrective action matrix.
    - Individual patterns related to violations that fall in levels A and B of the corrective action matrix.

This does not prohibit any individual member of the Compliance team from making their own notification to Internal Affairs.

B. Precinct and Division Reporting

The Compliance team will report all results, findings, and identified wider trends (such as Department or Precinct) to the respective Precincts and Divisions, ensuring Command Staff and supervisors have visibility into the Department's performance.

C. Training Division Coordination

Identified wider trends will be shared with the Training Division to support policy reinforcement, inform curriculum development, and facilitate targeted learning opportunities across the Department and topics.

D. Policy Team Coordination

Identified wider trends will be shared with the Policy team to inform policy updates, enhance operational consistency, and support proactive risk mitigation across the department.

IV. Independence

Compliance team members must maintain their independence so that their opinions, findings, conclusions, judgments, and recommendations will be impartial and will be viewed as impartial by reasonable and informed third parties.

A. The Compliance team shall have no direct responsibility or authority over the activities or operations that are subject to review.

B. Compliance team members shall not conduct compliance reviews or audits of their own actions or any police incidents they were involved in.

V. Authority and Responsibilities

C. The Compliance team shall have full and unrestricted access to all MPD functions, records, physical property and personnel who may be relevant to a Compliance team assessment, unless specifically authorized in writing by the Chief of Police.

D. The Compliance team shall maintain information gathered as part of its review process as confidential within the Implementation Division, unless otherwise instructed by the Implementation Division Commander.

E. When conducting an audit, the Compliance team will follow the applicable chapters of the Generally Accepted Government Auditing Standards (GAGAS).

VI. Review Process

The Compliance team follows these processes when planning and conducting a Compliance team assessment:

A. Planning

1. Research

   The assigned Compliance team member researches the topic by examining relevant information such as current or proposed MPD policies and procedures, best practices, laws, and, if applicable, may conduct interviews with internal subject matter experts.

2. Draft documents

   After researching, the assigned member prepares a mapping document, standard operating procedures (SOP), a scorecard template, and an electronic submission form, and gathers any other required or helpful documents.

3. Test compliance review

For compliance reviews, after drafting, the Compliance team performs a test run to verify the assessment functions as intended. During this period, all documents may be updated to match the scope and objectives of the compliance review.

4. Finalized assessment

The final versions of all Compliance team assessment documents are then reviewed for approval by the Implementation Division and Compliance team leadership. Once approved, the assessment may proceed.

B. Assessment Process

1. Data

Each Compliance team assessment begins with a data set (population). A sample is selected from the population and then distributed among the members conducting the assessment.

2. Conducting assessments

The assigned members then perform the assessment, review all relevant data (such as body worn camera (BWC) or in-car camera (ICC) video, CAD data, Police Reports, etc.), and assess compliance with all policy requirements.

3. Results and reporting

a. The assessment results are then compiled into a scorecard that shows the compliance percentage for all criteria of the assessment.

b. Audit results will follow the report standards of Chapter 9 of GAGAS.

VII. Transparency

Once Compliance team assessments are completed and the results are finalized, MPD will share applicable findings with the public on its public website, in accordance with the MN Government Data Practices Act.

Glossary

Compliance Team Assessments: Assessments conducted by the Implementation Division's Compliance team, that include compliance reviews, and formal audits.

Audit: An objective and reliable assessment of a function of the organization conducted in order to enhance transparency, improve public accountability, and facilitate decision-making in accordance with Generally Accepted Government Auditing Standards (GAGAS).

Compliance Review: An informal assessment of a specific function or aspect of the Department and its members to provide a better understanding of the Department's performance in lieu of a formal audit. A compliance review does not always follow all aspects of Generally Accepted Government Auditing Standards (GAGAS).