SAINT PAUL
HUMAN RIGHTS & EQUAL ECONOMIC OPPORTUNITY

DEPARTMENT OF HUMAN RIGHTS &
EQUAL ECONOMIC OPPORTUNITY (HREEO)

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MONTH* *DATE* *YEAR

TO: Mayor Kaohly Her

FROM: PCIARC Coordinator Sierra Cumberland

SUBJECT: Recommended Updates to Saint Paul PCIARC Process

The March 3rd, 2026, letter to the PCIARC from Mayor Her affirmed the values of transparency, accountability, and public trust shared by the PCIARC. The Commission appreciates the Mayor's invitation to engage with ideas regarding process improvement. Following the conversation and receipt of this letter, the Commission undertook a review of the 2015 Audit by the University of Minnesota's Center for Restorative Justice and Peacemaking (2015 Audit) and the Agreement between the Saint Paul Police Department and Saint Paul NAACP (NAACP Agreement), comparing them to current practices. The following advancements to the PCIARC model are recommended. This work is founded in continued partnership with the Saint Paul Police Department and the City Attorney's Office, with our shared dedication to continuous improvement of services to our community.

1. **All complaints reviewed by PCIARC:** PCIARC Coordinator should gain access to complaints closed by the Internal Affairs Unit (IAU) without PCIARC review, including the rationale therefore. The Coordinator should also have the ability to flag closures for reconsideration in collaboration with IAU. The Coordinator would be better able to inform Commissioners, respond to questions, and report trends to PCIARC.
    a. **Currently:** PCIARC Coordinator does not have access to complaints filed through IAU before the investigation is complete, nor the individual rationale for why complaints are closed without PCIARC review. Community trust would be increased if the PCIARC Coordinator could confirm reasons for complaint closure without PCIARC review and better respond to inquiries from community members.
    b. NAACP Agreement section 7 requires that "All citizen-initiated complaints and investigations will be reviewed by the PCIARC." Complaint access by the Coordinator would increase compliance with the NAACP Agreement without increasing the burden on Commissioners.
    c. Recommendation #1 of the 2015 Audit: "It is imperative that the City follow through on the intended PCIARC oversight of reviewing and making decisions on all citizen-initiated complaints and investigated cases about police conduct." Recommendation #14 of the 2015 Audit includes improved cross-department information sharing.

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2. **External Investigations** PCIARC should adopt criteria by which an independent investigator could be engaged, in line with guidance from the City Attorney's Office.
    a. **Currently:** IAU investigates external complaints which are eligible for PCIARC review. § 102.03 (f) of the PCIARC ordinance provides, "The commission may, as provided by a city contract, hire a private investigator as approved by the mayor or the director of the Department of Human Rights and Equal Economic Opportunity." This has not been done.
    b. The 2015 Audit recommendation #11 suggests that "An automatic trigger for independent investigation should be established, specifically for alleged acts of excessive force and inappropriate use of firearms." This has not been done.
3. **Informed disciplinary recommendations** A brief summary of previous sustained complaints about officers should be made available to the PCIARC when deliberating disciplinary recommendations.
    a. **Currently:** Commissioners receive only summary disciplinary history, including the level of prior discipline issued and the category of the complaint resulting in discipline. Many of the Chief departures from disciplinary actions recommended by PCIARC reference adherence to the concept of progressive discipline. More precise knowledge of whether a prior disciplinary action arose from an issue the same or similar to the one under review is required to issue recommendations more in accordance with progressive discipline.
4. **Review of individualized traffic stop and use of force demographic data** Standardized civilian review of officer traffic stop and use of force demographic data for outliers would boost SPPD mechanisms regarding equality of enforcement.
    a. **Currently:** Departmentwide data is made public each year. At the 2026 NAACP SPPD Townhall, community members asked about accountability measures for those whose data may indicate racial profiling. SPPD's early warning system monitors the demographics of officer traffic stops and use of force. When an outlier is identified, supervisors address the trend with officers.
    b. The NAACP Agreement states "The PCIARC and the police department, in cooperation with community, will adopt methods to better identify and review for race-based policing and racial profiling."
    c. §102.01(b) of the PCIARC ordinance requires that completed investigations into allegations of racial profiling be reviewed by the Commission.
5. **Accessibility of joining the PCIARC** The work burden required of PCIARC membership, paired with the low stipend amount reduces or removes access for many community members who would otherwise like to join the Commission. Increasing the stipend would help to diversify the body of the PCIARC.

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a. **Currently:** The number of external PCIARC complaints received has been steadily increasing. PCIARC membership was about a 15-hour monthly commitment in 2019. Case review has now grown to about 40 hours per month. The stipend of $50 per meeting has not changed since the Commission was created in 1994.
b. The current stipend amount is set in by the PCIARC ordinance §102.02 (d).

6. **Consider renewed community feedback sessions and independent review of PCIARC model for updated process recommendations**
    a. PODPA now allows findings of fact, allowing civilian oversight to move beyond recommendations only. As we've learned from other jurisdictions, there are many forms civilian investigations could take. These include:
        i. Independent team of civilian investigators housed in HREEO or ONS
        ii. Civilian investigators in IAU
        iii. Additional powers, duties, and staff for PCIARC in HREEO
    b. Much has changed in the 11 years since the 2015 Audit. Broad change to civilian oversight of SPPD cannot happen without intentional community input. We recommend a new and comprehensive review that would provide updated community feedback and independent recommendations on how to best modernize PCIARC, the Saint Paul way.

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