

**Eric D. Batista**  
City Manager



City of Worcester

---

March 4, 2025

Attachment for Item #9.13 A

TO THE WORCESTER CITY COUNCIL

COUNCILORS:

When the United States Department of Justice (DOJ) released a report on Dec. 9, 2024, detailing the findings of an investigation into the Worcester Police Department (WPD), my administration wanted to be conscientious in our response.

In the three months since its release, we have pored over the report, considering the DOJ's findings and 19 recommendations as well as orders made by your Honorable Body. The attached communication is a "Summary Report of the Worcester Police Department's Current and Ongoing Practices Relative to Department of Justice Investigation," as received from Paul B. Saucier, Police Chief, and forwarded for the consideration of your Honorable Body.

The communication looks to address your requests, specifically regarding a review of the DOJ's recommendations within the context of the WPD's existing policies and procedures and current practices.

The WPD had been committed to improving its practices to promote fair, safe, unbiased and effective policing in the Heart of the Commonwealth long before the DOJ launched its investigation. As such, the Department is consistently taking steps to review its policies to make sure they are best serving the community as well as the officers that must follow them.

Independent of the report, WPD previously underwent a racial equity audit, conducted by the Center for Naval Analyses (CNA), which involved an external review of its institutional norms, systems, policies, and practices and resulted in several recommendations on improvements to its Diversity, Equity, and Inclusion (DEI) efforts. The resulting report was published in March 2024, and we found that, in many cases, CNA's recommendations had already been adopted or were in process of being adopted. For example, in October 2023 the WPD created a Policy Review Committee that works

alongside the municipality's Chief Equity Officer and consults the Human Rights Commission. A full description of the WPD's work related to the full list of CNA's recommendations will be presented in a forthcoming public webpage.

Similarly, the WPD already had policies and procedures in place that address many of the DOJ's concerns and recommendations. This is partly due to the DOJ's focus on the time period from 2018-2022, which does not capture the practices of the WPD that have changed since that time. Specifically, related to Use of Force, the Department has already deployed Body Worn Cameras, a Crisis Intervention Team, and voluntary mental illness and de-escalation training for all officers.

The Department is looking to address any remaining recommendations from the DOJ and CNA that it has not yet adopted. Some of those measures include developing new policies related to undercover officers and sexual assault investigations. A policy related to the latter will memorialize the trauma-informed practices employed by officers and be referred to the Chief Equity Officer for review by the Human Rights Commission, and all officers, not just those in the Sexual Assault Unit, will receive training in trauma-informed and victim-centered investigations.

Changes to the Use of Force policies prohibit the use of canines at mass gatherings, require a supervisor to go to the scene if a subject or officers report an injury, require a supervisor to write a report in all Use of Force incidents deemed level 3 or higher, and establish a Use of Force Committee that will review Use of Force Incidents and refer any that fall outside the policy to a Commanding Officer, and if appropriate to BOPS, for further investigation.

Both CNA and the DOJ raised concerns related to the Department's data collection and analysis practices. The WPD has been diligently working to address those concerns. In order to be as transparent as possible, the Department is sharing as much information as it can with the public through the municipality's online data portal, Informing Worcester, and its social media accounts. The Department is constantly looking to expand the amount of data provided to the public and is exploring the possibility of creating a dashboard where traffic stop data would be available to the public through the municipal website. The department has found itself limited by its existing records management system (RMS) and is in the process of moving to a new software system that is targeted to be online in the next 12 to 18 months.

As these improvements come to fruition, the WPD has proactively engaged retired FBI Civil Rights Unit Chief Ron Reed to provide independent, additional training on Constitutional Law for all 400 of the Department's officers, beginning April 2025.

In any organization, there is always room for improvement, and we are exploring all possible tools to optimize public safety and public trust. I previously stated that my Administration would prepare a report for your Honorable Body to review the structure of a Civilian Review Board. That has remained a priority, and I am pleased to provide an update on that process. Following discussions with the Worcester Regional Research Bureau (WRRB), the WRRB has informed my Administration that it will take the lead on performing an independent review and compiling a research report on Civilian Review Boards. I look forward to their objective analysis.

This report will not mark the end of our communications related to the DOJ investigation. We will continue to update you as further measures are implemented related to recommendations made by the DOJ. An open line of communication is necessary to build strong relationships with my Administration, the WPD, and the Worcester community, and we are committed to this work.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Eric D. Batista". The signature is stylized and fluid, with a large initial "E" and "B".

Eric D. Batista  
City Manager



# The City of Worcester

**Worcester Police Department**  
Paul B. Saucier, Interim Chief of Police  
9-11 Lincoln Square, Worcester MA 01608  
P| 508-799-8600 F| 508-799-8680  
WPD@worcesterma.gov

**DATE:** MARCH 4, 2025  
**TO:** ERIC D. BATISTA, CITY MANAGER  
**FROM:** PAUL B. SAUCIER, CHIEF OF POLICE  
**SUBJECT:** DEPARTMENT OF JUSTICE ACTIONS

Relative to the City Council's requests for information on actions taken by the Worcester Police Department (WPD) in response to the Department of Justice report on the WPD, the following report is transmitted for the review.

Respectfully Submitted,

Paul Saucier  
Chief of Police

## **Summary Report of Worcester Police Department's Current and Ongoing Practices Relative to Department of Justice Investigation**

Since the release of the Department of Justice's (DOJ) Dec. 9, 2024 report, the Worcester Police Department ("WPD" or "Department") has been conducting an initial assessment of the DOJ's analyses, findings, and recommendations. DOJ raised many concerning allegations in its report, and the Department takes these allegations seriously, even where it might not agree with DOJ's methodology or conclusions. The Department cooperated fully with DOJ's investigation, and is committed to providing fair, transparent, unbiased, and effective policing to the Worcester community.

This initial report outlines WPD's reforms and improvements that relate to the findings and recommendations made by the DOJ. As the DOJ's investigation specifically looked at the timeframe during 2018-2022, the DOJ's report does not reflect WPD's current practices, including reforms and improvements made since 2022. **Part I** of this report provides a high-level summary of those many measures, grouped by relevant DOJ recommendation. In some cases, individual recommendations are addressed, while in others they are collectively explained. Furthermore, the WPD remains committed to promoting transparency and accountability, to earning and maintaining public trust, and to serving the Worcester community through unbiased and fair policing. **Part II** of this report details the many remedial measures proactively undertaken to fulfill that commitment and to address the findings outlined in the DOJ report, as well as the Racial Equity Audit previously conducted by the Center for Naval Analyses (CNA) published in March 2024.

### **I. WPD's Current Practices and Past Improvements**

WPD has been and remains committed to improving its practices to promote fair, safe, and effective policing in the Worcester community. This commitment predates the CNA Racial Equity Audit and DOJ report, and it will continue into the future. This section outlines current WPD practices, with a focus on the enforcement activities relied upon by DOJ in reaching its conclusions, including policies, procedures, and mandatory training requirements.

In addition to the specific measures detailed below, in October 2023, the WPD created a Policy Review Committee to review and improve its policies and develop new policies as necessary. Priorities are determined based on identified and relevant issues/potential issues, as well as external input such as the CNA Racial Equity Audit, changes in the law, and updates to best practices. More than 60 officers expressed interest in serving on the Committee, which consists of both police officials and officers. The WPD also works with the municipality's Chief Equity Officer, who consults with the Human Rights Commission (HRC) for policy input as appropriate. In addition, all policies are separately reviewed by the WPD's Diversity, Equity, and Inclusion (DEI) team to identify any inherent systemic racism and correct the same.

## *1. Use of Force*

The DOJ included five recommendations related to use of force, including improved policies and training, review, data collection, reporting, and responses to behavioral health calls.

**DOJ Recommendation #1: Improve Use of Force Policies and Training.** Revise policies and training to provide clearer guidance on use of force, de-escalation, and using less intrusive alternatives before resorting to force. Provide specific guidance regarding the use of Tasers, including in drive-stun mode, the deployment of police dogs, strikes to the head or face, and interacting with individuals with behavioral health disabilities. Clarify when WPD can use police dogs and where police dog bites fall on the use of force continuum. Ensure canine policies are consistent with WPD's general use of force policies.

**DOJ Recommendation #2: Improve Use of Force Reporting Systems.** Ensure WPD officers report uses of force with sufficient detail to determine whether each use of force is appropriate, including any de-escalation tactics employed and the circumstances preceding the use of force. Require officers to include photo documentation of subject and officer injuries sustained from uses of force.

**DOJ Recommendation #3: Improve Use of Force Review Mechanisms.** Ensure supervisors conduct thorough reviews of officers' uses of force, including reviewing body-worn camera footage. Implement systems for finding unreported force.

**DOJ Recommendation #4: Improve Data Collection and Assessment of Force.** Collect and assess data to identify use of force trends, such as types of force used, demographic data on the subjects of force, and types of encounters leading to the use of force. Implement changes to policies, training, tactics, and enforcement strategies as necessary to address problematic trends found through that review. Ensure officers include demographic details including age, gender, and race in force reports.

The WPD has existing policies and procedures in place that already address many of the use of force concerns raised by DOJ in its report. These include:

- WPD Use of Force policy ([Policy No. 400](#)), which provides clear guidance on use of force, the required use of de-escalation techniques, and the use of specific devices and techniques. For example, the Use of Force policy makes clear that all officers will receive training on de-escalation techniques and are required, when feasible, to attempt de-escalation tactics prior to using force. Consistent with the Conducted Energy Weapon (Taser) Guidelines ([Policy No. 400.5](#)), it also makes clear that the use of tasers in drive-stun mode constitutes a level 3 use of force, while the use of tasers in probe deployment mode constitutes a level 4 use of force. The Use of Force policy further clarifies that distraction techniques requiring strikes are prohibited at level 3, and that strikes are considered to be a level 4 use of force.
- All officers receive extensive training (both in the Academy and in-service) on use of force, including on topics such as de-escalation techniques, proportionality, types of

force, and reporting requirements. Officers may also receive additional training. For example, under Municipal Police Training Committee (MPTC) guidelines, officers are only authorized to deploy and discharge conducted energy weapons (tasers) once they are trained and certified as to their application, use, and place in the use of force continuum. *See* Conducted Energy Weapon (Taser) Guidelines (Policy No. 400.5).

- In 2018, the City of Worcester and WPD began researching a body worn camera (BWC) program to enhance safety, accountability, and transparency. At the beginning of 2019, WPD launched a BWC Pilot Program to field-test the use of BWC. Twenty officers volunteered to participate in the program, which ran from May to November of 2019. After evaluating and assessing the pilot program, the City and WPD explored vendor options and costs throughout 2020. In 2021, the City and WPD, in partnership with the HRC, hosted community listening events about BWCs to learn and respond to resident concerns. In 2022, a final proposal for the BWC program was filed with City Council, as well as a recommendation that was drafted by WPD with input from the Law Department and the American Civil Liberties Union (ACLU). The contract for the technology and training on BWC was awarded to Axon, and officers received 16 hours of training on the equipment and the proper use of BWC. The full BWC program officially launched in February 2023. DOJ was authorized to access and review BWC footage from the 2019 Pilot Program and from the full program between February-April 2023.
- The Worcester Police K-9 Guidelines ([No. 401](#)) make clear that dog apprehensions shall be reported as uses of force and that the use of canine force must be in accordance with the guidelines of a level 4 use of force. The K-9 Guidelines are comprehensive and outline when and how a K-9 can be deployed. The policy also requires that all dog bites are photographed, regardless of the nature of the injury. The K-9 unit supervisor must be informed if there is a K-9 use of force, and a post-bite interview is conducted with the suspect after the incident.
- WPD trains its K-9s and K-9 officers to use the “bite and hold” method instead of the “bark and hold” method and conducts the vast majority of its deployments on lead, meaning that the handler maintains control and sight of the K-9 throughout the search. The “bark and hold” method is often used with the K-9 off lead (i.e., out of sight of the handler), which puts the decision of whether to bite or not on the dog and not the handler. The “bite and hold” method has been found to be safer and has a significantly lower bite-to-apprehension ratio than the “bark and hold” method.<sup>1</sup>
- In assessing the effectiveness of the “bite and hold” method, WPD partnered with a veterinary researcher from Tufts University who reviewed canine deployments in the city. The data analyzed by the researcher revealed that there were 15 bites from 2017 to 2022 out of 109 displays of K-9s. A display is anytime a K-9 is involved in any police function (a K-9 exiting a cruiser, barking, and going back into the cruiser is considered

---

<sup>1</sup> See Charlie Mesloh, *Barks or Bites? The Impact of Training on Police Canine Force Outcomes*, POLICE AND PRACTICE RESEARCH, Vol. 7, No. 4 (Sept. 2006).

a “display”). The Department’s bite ratio of 13.7% is well below the justified bite ratio discussed in *Kerr v. City of West Palm Beach*, 875 F.2d 1546, 1551 (11th Cir. 1989) (expert testified that “less than thirty percent of apprehensions, on average, should result in a bite”). Members of WPD’s K-9 unit informed DOJ about this research project during the investigation.

- WPD already requires extensive training of K-9s and K-9 handlers well above the industry standard of 16 hours of training per month. WPD trains its canines and handlers for 24 hours per month, in addition to a 3-day (24 hour) in-house workshop once per year. While the Commonwealth of Massachusetts has no standard training in place for K-9s, WPD requires the K-9s to conduct a 14-week (560 hour) basic patrol school before any K-9 is deployed. Every K-9 is also certified on an annual basis by a third-party certifying body.

#### **DOJ Recommendation #5: Improve Responses to Behavioral Health Calls for Service.**

Track and analyze data about responses to behavioral health-related calls, including when CIT officers respond to the scene. Coordinate with other available resources so that behavioral health professionals can respond to people experiencing a behavioral health crisis. Ensure that WPD deploys officers who are equipped to respond to behavioral health-related issues that need a police response. Conduct regular review and assessment of WPD’s response to incidents related to behavioral health.

- WPD has a Crisis Intervention Team (CIT) consisting of four (4) full-time officers. In addition to this dedicated team, officers across the Department can voluntarily receive 40 hours focused on mental illness and de-escalation training and certification from Open Sky Community Services, Inc., a nonprofit focusing on behavioral health and mental health services. Approximately 100 officers have elected to participate in this voluntary training. All officers in the Academy also receive 12 hours of CIT training. The Department’s CIT team partners with the Commonwealth’s Department of Mental Health, Community Healthlink, Inc., and other appropriate agencies to connect people in crisis with clinicians and resources.

## ***2. Prostitution Sting Operations and Public Complaint Pathways***

The Department’s Vice Squad investigates drug- and prostitution-related offenses and consists of 15 officers and 4 supervisors. The Vice Squad rarely conducts prostitution-related stings and, when it does, they generally focus on targeting demand (“Johns”). During the 2018-2022 period of the DOJ’s investigation, prostitution stings were only conducted in response to neighborhood complaints from members of the community, such as business owners and schools.<sup>2</sup>

---

<sup>2</sup> In total, approximately 2,465 drug- and prostitution-related arrests were made from January 2018 to November 2022, of which approximately 2,100 related to drug offenses (~85%) and approximately 365 pertained to prostitution-related offenses (~15%). Of the prostitution-related offenses, WPD arrested 204 “Johns” and 99 women engaged in prostitution activities. Vice Squad conducted only approximately 30 prostitution stings in the relevant five-year period, otherwise devoting its resources to drug enforcement.

The WPD does not condone sexual misconduct of any kind and takes any allegations of any misconduct very seriously. It supports the investigation and prosecution of any officer found to have engaged in sexual misconduct of any kind.

**DOJ Recommendation #6: Develop Policies and Trainings Related to Enforcing Laws Related to Buying or Selling Sex.** Provide clear guidance to WPD officers about permissible investigative techniques to enforce these laws, including a complete prohibition on engaging in sexual contact for law enforcement purposes. Develop policies clarifying how undercover officers may engage with members of the public, the scope of permissible conduct, reporting requirements, and how supervisors review officers' undercover activity. Require officers to record the transport of anyone arrested for a sex offense.

**DOJ Recommendation #7: Improve Supervision Practices.** Require close and effective supervision of officers who enforce laws related to buying or selling sex and who interact with people involved in the commercial sex trade or confidential informants. Require supervisors to review any reports and audio/video documentation related to enforcement of these laws and require secondary command-level review of these reports. Implement supervisory practices to ferret out potential officer misconduct, such as closely reviewing officer activity, body-worn camera footage, and vehicle location data in locations known for activity related to the commercial sex trade to spot suspicious patterns.

**DOJ Recommendation #8: Develop and Implement Policies and Procedures to Report and Investigate Reports of Officer Sexual Misconduct.** Explicitly prohibit WPD employees from engaging in any on-duty sexual conduct, and any on- or off-duty sexual misconduct, which includes the use of coercion, force, threats, or quid pro quo offers, as well as consensual sexual conduct with individuals whom officers encounter as part of their law enforcement duties. Require officers to report sexual misconduct. Adopt a zero-tolerance standard that clearly states engaging in sexual misconduct or failing to report sexual misconduct is grounds for disciplinary action, up to and including termination. Develop policies on coordination between the Sexual Assault Unit and the Bureau of Professional Standards during sexual misconduct investigations. Require comprehensive training for all employees on these policies.

While there are no policies that directly govern Vice Squad operations apart from other units within WPD, the practices and standards of conduct already apply to the Vice Squad and WPD more broadly:

- Vice Squad supervisors are already required to closely monitor sting operations, including by participating in briefings with officers prior to the sting to discuss the plan and importance of the sting. During the sting, surveillance officers are in constant visual contact with the undercover officer(s) and suspect(s). Supervisors are also required to sign off on all officer reports after the sting.
- While the Vice Squad officers are not required to complete additional training, members of the Vice team may voluntarily attend trainings sponsored by the Drug Enforcement Administration (DEA), state police, and MPTC, such as courses in street-level narcotics, covert undercover surveillance, and gangs. Several officers have also

attended human trafficking courses at Anna Maria College offered by the Massachusetts State Police.

- While the Department does not have a separate departmental policy related to police sexual misconduct, the City's employee policies are applicable to WPD. WPD officers are subject to the municipality's Sexual Harassment Policy and Procedures ([Policy No. 215](#)). The comprehensive policy details what constitutes sexual harassment and prohibits retaliation against anyone who files a complaint or cooperates in an investigation. The policy makes clear that any violation of the policy, including any retaliation, is subject to discipline, including possible discharge.

**DOJ Recommendation #9: Require Background Checks.** Ensure WPD does not hire officers known to have engaged in sexual misconduct.

- WPD already conducts rigorous background investigations before hiring officers, including criminal background checks, neighborhood canvassing, reference checks, and interviews of family members, friends, and former employers, and audio recorded interviews with the candidate. This well-established process generally takes six months to complete has been documented in policy for over three decades. Further, state and national background checks are required in order to obtain Peace Officer Standards and Training (POST) Certification. WPD does not hire officers who are known to have engaged in sexual misconduct.

**DOJ Recommendation #10: Eliminate Barriers to Reporting.** If charging individuals with low level offenses (such as drug possession or underage alcohol consumption) that are discovered because the person reported sexual assault or officer sexual misconduct, require supervisor approval and consideration of whether the charges would discourage future reporting. Establish requirements for charging such individuals with any other offenses that come to light because they reported sexual assault or officer sexual misconduct.

- WPD offers anonymous reporting and complaint mechanisms for the public through its online tip and text-a-tip tools, neither of which asks for the reporter's identity or contact information ([worcesterma.gov/police/investigations/crime-tips](http://worcesterma.gov/police/investigations/crime-tips)). Both methods are confidential and mask the identity of the sender from the police. WPD's website makes clear that the identity of the sender is confidential, and that the complainants can remain anonymous if they so choose. Additionally, WPD's form to submit citizen comments and complaints can be submitted online or in hard copy. The public can also submit anonymous reports of police misconduct to the POST Commission ([policecomplaints.mass.gov/complaint](http://policecomplaints.mass.gov/complaint)).

### ***3. Sexual Assault Investigations***

**DOJ Recommendation #11: Trauma-Informed Sexual Assault Investigations.** Develop policies, procedures, and trainings for patrol, BOPS, and SAU detectives that focus on trauma-informed investigations and how to respond to and investigate sexual assault by officers and in

the community. Ensure policies and training emphasize that detectives should not close investigations as a matter of course when witnesses and victims are reluctant to speak with police.

The DOJ examined the practices of the Sexual Assault Unit (SAU) and whether the Unit's approach is appropriately victim-centered or trauma-informed. The SAU's current practices include:

- Trauma-informed policing that is consistent with the Commonwealth's Adult Sexual Law Enforcement Guidelines and MPTC training. The SAU explains to victims from the outset of their investigation that the victim holds the ball and is in charge of the investigation, including whether to follow the case all the way to court or to drop the case at any time. Officers inform victims about the statute of limitations and provide an overview of the investigation and prosecution process, but otherwise will follow the lead of the victim and make every effort not to re-traumatize the victims by pressuring them to be interviewed or conducting multiple interviews.
- Partnerships and Referrals to Support Services. The SAU partners with and connects victims to a wide variety of advocacy and support groups. In cases involving children, WPD partners with the accredited Child Advocacy Center (the "Center") through the District Attorney's (DA) Office. The Center's partnership involves several non-governmental organizations that work with child victims, including the Seven Hills Foundation. WPD works extensively with the Worcester Intervention Network through the YWCA to support victims of intimate partner abuse and sexual assault and sits on the boards of the Domestic Violence High Risk Teams (DVHRT) and Domestic Violence Fatality Review Teams (DVFRT) to be able to identify, address, and rectify potential gaps in the system. WPD routinely refers adult victims of non-intimate partner sexual assaults to Pathways for Change, a community advocacy center located in Worcester. Elder victims are referred directly to Elder Services, a state advocacy service with connections to other community services. WPD supplements these referrals as appropriate, including for victims with physical and developmental disabilities.
- Documentation and Coordination with DA's Office. WPD, and the SAU in particular, has a very close relationship with the DA's Office, frequently collaborating on cases and working together to connect victims with support services and other resources. Ultimately, the DA's Office, equipped with the SAU's reports and evidence, decides whether or not to prosecute each case. As such, and as recognized by the Commonwealth's Guidelines, officers have an obligation to make note of important details, including, but limited to, any physical or verbal resistance on the part of the victim, any victim injury, the victim's thoughts before and during the assault, the relationship between the victim and offender, any alcohol or drug use or other incapacitation of the victim, the existence of any physical evidence, any seemingly inconsistent statements made by the victim, any memory blackouts or lapses during or after the assault, and any delays in reporting. These details are essential facts in evaluating whether there is sufficient evidence and probable cause to satisfy the

elements of the crime under Massachusetts law—and are necessary and important to the SAU’s work.

- **Assessment of All Available Evidence.** The WPD collects, reviews, and analyzes all available evidence in its sexual assault investigations. The SAU’s approach to this additional evidence is consistent with its victim-centered model: officers will not put victims in danger or involve others in the investigation without permission from the victim. If officers are unable to reach a victim after making reasonable efforts to do so, they will not proceed with speaking to other witnesses or collecting additional evidence so as not to endanger or retraumatize the victim or to break the trust between the officers and the victim.

In addition to the SAU’s trauma-informed and victim-centered approach to investigations, its utilization of community and advocacy resources to support victims, and investigators’ management of ongoing investigations, the SAU detectives and officers complete extensive training through the Department’s Academy and the MPTC. Not only does MPTC training require three hours of trauma-informed policing for all officers, but one of the SAU’s detectives is the lead instructor for the MPTC’s trauma-informed policing, human trafficking, domestic violence, hate crimes, and sexual assault trainings. All SAU investigators are also required to be certified in Sexual Assault Investigator Training (40 hours) through the MPTC. Officers are also encouraged to take advantage of grant funding to attend specialized training opportunities at the local, state, and national level.

#### *4. Assessing Data and Addressing Disparities*

**DOJ Recommendation #12: Improve Documentation of Police Activity.** Ensure public safety data collection allows for analysis of racial disparities, including for stops (including those that do not result in a citation or arrest), searches, citations, arrests, force, and investigative activities, as well as the basis for the enforcement action and the results of each search. Ensure data collection allows for analysis of enforcement for youth.

**DOJ Recommendation #13: Analyze Data from Enforcement Activity.** Develop capacity to analyze data about disparities in enforcement activities based on race or national origin, including for youth, to understand the cause of any disparities. Publish the results of this data analysis.

**DOJ Recommendation #14: Meaningfully Address Disparities.** Where WPD finds racial disparities in its enforcement practices, implement changes to policies, training, supervision, tactics, and/or enforcement strategies to address those disparities. Consider community perspectives when developing corrective action plans.

While WPD is fully supportive of additional data collection and sharing of data with the public, it must acknowledge that to date, it has been limited by the capabilities of the existing record management system (RMS). In addition to the future reforms planned in connection with the replacement and modernization of the RMS (described more fully in Part II below), WPD has sought to identify and address disparities as follows:

- WPD has a Crime Analysis division that regularly analyzes available data, including demographic data such as race, gender, and age. Crime Analysis also compiles and prepares data for mandatory reporting to the Commonwealth.
- In February 2021, nearly two years before DOJ announced its investigation into the WPD, the City of Worcester announced an Executive Order to Assess and Address Institutional and Structural Racism. As part of its commitment to review and analyze systems, policies, and practices, the City proactively engaged CNA to conduct an independent racial equity audit of the Department. The audit was completed in March 2024.
- As a result of the CNA audit, the City Manager and Police Chief have sought to address racial disparities within the ranks of the Department by recommending that the positions of Police Chief and Deputy Police Chief be exempted from the Massachusetts Civil Service Law. In March 2024, Worcester City Council unanimously approved the City Manager’s petition to seek approval from the Massachusetts legislature to remove the Chief and Deputy Chief positions from Civil Service. The petition was approved by the legislature in November 2024, and the exemption, which will allow the City Manager to select candidates based on their experience and background (and not on their standardized testing results), will take effect on March 1, 2025.
- WPD has been successful in its outreach and recruitment that reflect its commitment to diversification of its workforce. The Department is rapidly diversifying its ranks; the two most recent Academy classes are more diverse demographically than any in WPD’s history, with demographics of the most recent classes consisting of 35% Latino, 35% White, 16% Black, and 13% Asian.

## ***5. Accountability and Supervision***

**DOJ Recommendation #15: Eliminate Barriers to the Complaint Process.** Ensure civilians can file anonymous complaints. Prohibit requiring criminal background checks of complainants without added justification. Clarify policy so BOPS receives all complaints made during an arrest or booking. Develop policy on the handling of third-party complaints. Ensure that any complaint made is documented and taken seriously. Require WPD officers to handle complaints by members of the public appropriately.

The WPD is continuously striving to improve accountability and transparency. These existing measures include but are not limited to the following:

- A complaint can be made against any of the WPD’s sworn or civilian personnel through several pathways. In addition to the anonymized options described above, a complaint can be made in person, by mail, by email, or by fax.
- The WPD also has Citizen Complaint Forms available in several languages (English, Spanish, Vietnamese) at several locations around the city, including at the Department’s

Service Division, the City Manager's office, the Mayor and City Council offices at City Hall, the Human Rights Commission, the ACLU, and at neighborhood centers.

**DOJ Recommendation #16: Improve Civilian Complaint Investigations.** Ensure that BOPS conducts investigations of serious misconduct and uses of force. Conduct rigorous investigations of all such complaints, even if an officer is not named, and follow all relevant leads referenced in complaint or that emerge during the investigation, including attempting to speak to all relevant witnesses. Provide training about how to continue with an investigation even if the complainant does not participate. Secure and review any available body-worn camera footage or other video evidence as part of the investigation. Develop mechanisms to find and comprehensively investigate allegations of misconduct, regardless of the reporting source, and regardless of whether the victims or witnesses of such allegations are willing to cooperate with WPD.

- The WPD's Bureau of Professional Standards (BOPS) is responsible for investigating complaints and for responding to allegations of misconduct. The Bureau of Professional Standards Investigations Policy ([Policy No. 500](#)) provides great detail on how BOPS conducts its investigations, including how investigations are assigned, who within and outside of the Department are notified, how investigations are documented, and potential discipline and mandatory reporting to the Massachusetts POST Commission.
- Pursuant to the WPD's Use of Force policy (Policy No. 400), supervisors are required to review all level 3 uses of force, while a commanding officer or his or her designee is required to review all level 4 uses of force. These requirements already include the review of body-worn camera footage pursuant to the Department's BWC Policy ([Policy No. 403](#)).

**DOJ Recommendation #17: Require Officers to Report Misconduct.** Ensure that officers report known misconduct and that WPD holds officers accountable if they do not report misconduct. Prohibit retaliation for officers who report misconduct of other officers.

- The Department's Anti-Retaliation Policy ([Policy No. 206](#)) imposes an affirmative duty on officers to report wrongdoing and misconduct and prohibits retaliatory conduct against or interference with an employee or civilian who makes or assists in the investigation of such a report. WPD worked with DOJ to ensure that its policy was sufficient and reflected best practices.

**DOJ Recommendation #18: Require Review of Body Worn Camera Footage.** Continue to require officers to consistently activate body-worn cameras and require supervisors to review footage to monitor officer performance and ensure compliance with WPD policies.

- Pursuant to the WPD Body Worn Camera (BWC) Policy (Policy No. 403), officers are required to activate BWCs, with limited exceptions, during all encounters with civilians, including during all 911 emergency and non-emergent calls for service, police-initiated investigations and stops, and when ordered by a supervisor. The policy

also requires that both BOPS and command staff randomly audit and review BWC videos. Currently, BOPS and command staff each review 20 videos per month.

**DOJ Recommendation #19:** Closely Manage Specialized Units. Develop clear eligibility requirements for selection into specialized units, including review of past performance, complaint history, and disciplinary history. Continue developing field training program to provide closer supervision of officers, particularly those in specialized units. Provide regular review and audits of the reports, arrests, enforcement strategies, and uses of force of specialized units.

- In addition to the case-by-case use of force reviews outlined above, the Department's Training Division may review, as appropriate or necessary, aggregate use of force data to identify patterns that may indicate any training or reporting deficiencies such as multiple uses of the same kind of force in a short time period or repeated issues with certain techniques like handcuffing, that may trigger a need for additional training or review.

## **II. WPD's Future Remedial Measures and Reforms**

In addition to the existing measures and those implemented to date, the WPD remains committed to reform, transparency, and accountability, and to building relationships and trust with the community. The WPD is open to recommendations, and takes the measures proposed by the DOJ seriously, even if it may not agree with DOJ's conclusions or methodologies. To that end, WPD is committed to enacting the following remedial measures and reforms, many of which are already underway.

WPD is in the process of engaging retired FBI Civil Rights Unit Chief Ron Reed to supplement current Constitutional Law training. The training will cover topics such as conspiracy, obstruction of justice, theft, sexual assault, use-of-force, and duty to intervene, and is designed to be interactive and based on real-world scenarios.

### ***1. Use of Force***

In addition to the current practices listed in Part I, WPD is in the process of further addressing and implementing many of the recommendations in DOJ's report and the CNA Racial Equity Audit. These measures include:

- The K-9 Guidelines Policy (Policy 401) has been revised to prohibit the deployment of canines at mass gatherings or riot scenes.<sup>3</sup> Prior to the directive issued by the Chief, K-9s were allowed to be deployed in these circumstances with supervisor approval.

---

<sup>3</sup> Practice has been updated pursuant to a directive issued by the Chief of Police and the updated policy has been sent to the HRC for review.

- Separate use of force forms are being created and will be required for all canine bites. The forms and associated BWC footage will need to be signed off on by a Captain (or designee) through the chain of command for final approval by a Deputy Chief.
- Pursuant to a Jan. 16, 2025 directive, supervisors reviewing use of force reports are required to prepare a separate report that documents how they conducted their analysis of the use of force, such as reviewing BWC footage or videos, responding to the scene of the incident, and/or witness statements.
- Pursuant to the Jan. 16, 2025 directive, if a subject reports an injury or an injury is observed by an officer, a supervisor is required to go to the scene of the incident to look for potential evidence.
- Pursuant to the Jan. 16, 2025 directive, all uses of force at level 3 and higher requires a written report from a supervisor. An official of higher rank is required to sign off on the supervisor's report.
- A new Use of Force Committee consisting of Training Division experts in each discipline has recently been established, and includes a WPD MPTC certified Use of Force instructor, taser instructor, and firearms instructor. This Committee will review level 4 and higher uses of force incidents through examining all available evidence, including BWC footage, and all taser probe deployments and drive stuns, to identify any training deficiencies that may have led to the specific use of force. This supplemental level of review will occur in addition to the current required chain of command review.
- All training academies have been extended to incorporate 40 hours of additional CIT training, starting with the January 2025 academy. In-service training will also be extended to include an abbreviated refresher training.
- The WPD is expanding its co-response model to allow coverage on the first half shift which will result in an additional 24 hours of coverage for a total of an additional 64 hours of coverage per week.

In Spring 2024, the MPTC announced that it is in the process of revamping Massachusetts state guidelines related to use of force and will be eliminating the five-level use of force continuum. MPTC has pledged to provide police departments with guidance, including a model use of force policy, in the coming months. MPTC is required to work with POST Commission on this process, and WPD has been informed that the process is ongoing. Once the guidance is received, WPD, with the assistance of the Policy Review Committee and the City's Law Department, will analyze and revise its use of force policy to comply with the state guidelines.

## ***2. Policies and Procedures Regarding Undercover Operations and Sexual Assault Investigations***

The WPD is supportive of memorializing its practices and procedures into formal policies, including as it relates to undercover operations and sexual assault investigations, as well as enhancing training in these areas, including:

- WPD has developed a new policy that applies to undercover officers. With respect to prostitution stings, officers will only be permitted to use the common nightwalker statute (M.G.L. Ch. 272, Sec. 53), which allows enforcement without having the subject enter the vehicle. This policy has been sent to HRC for review and comment.
- WPD is developing a new policy regarding sexual assault investigations. This policy will memorialize the trauma-informed practices employed by officers involved in sexual assault investigations, consistent with Massachusetts law. It will also call for officers to memorialize the DA's (and designee's) assessment of the case, including whether the case should be closed. This policy has been referred to the municipality's Chief Equity Officer for review by the HRC.
- A segment on trauma-informed and victim-centered investigations and the new policy will be added to in-service training for all officers, not just those in SAU.

## ***3. Assessing and Addressing Disparities***

Many of the recommendations in DOJ's report and the CNA Racial Equity Audit relate to data collection and analysis. WPD, with the support of the City, is in the process of replacing and upgrading its records management system (RMS), which will allow for improved data management and analysis in line with DOJ's and CNA's recommendations. This process has been underway since June 2021, and WPD currently expects that the new Hexagon RMS system will be online in the next 12-18 months.

- As part of this process, WPD is exploring the possibility of creating a dashboard where traffic stop data would be accessible to the public through the City's website. The current RMS system does not have the capability to generate this kind of reporting.
- The new Hexagon RMS system will also allow WPD to better track and analyze data related to behavioral-health related calls and responses by CIT officers.
- In anticipation of the upcoming transition to Hexagon, the Department is preparing a separate Use of Force reporting form, to be sent through the chain of command. Additionally, reviewing officials will provide narrative reports outlining their analysis and determinations.
- The new software system, Hexagon RMS, will allow for improved data collection of enforcement activities and will enable the Department to publish reports reflecting enforcement activities.

- Separate from the adoption of the new RMS system, the WPD has worked with the municipality's Executive Office of Diversity, Equity & Inclusion (EODEI) to develop a new Community Policing and DEI-Focused Curriculum for new student officers. The new curriculum was approved by the MPTC and has been integrated into the most recent Academy that began in January 2025.

#### ***4. Accountability and Supervision***

The Department is committed to continuing improvements in the areas of transparency and accountability, including by enhancing its current processes and expanding oversight and training as follows:

- The Bureau of Professional Standards Investigations Policy (Policy No. 500) will be updated to ensure that all use of force complaints are handled by BOPS. Once developed, this policy will be reviewed by the City's Chief Equity Officer, Law Department, and the Department's Policy Review Committee.
- If the new Use of Force Committee, described above, finds that any Use of Force incident reviewed falls outside of policy, that incident will be referred to a Commanding officer, and if appropriate to BOPS, for further investigation.
- Academy and in-service training on the duty to intervene law will be expanded as part of the planned supplemental training with retired FBI Civil Rights Unit Chief Ron Reed described above. Currently, all officers are trained on the duty to intervene as part of the Use of Force policy training which includes M.G.L. Ch. 6E, §15 and required departmental procedures.
- Random audits and review of BWC footage by both BOPS and command staff will increase from 20 to 32 videos per month. The videos will continue to be randomly selected by the Axon Performance system.
- WPD has developed a policy that will govern the selection of officers into specialized units. Pursuant to this new policy, all selections will be made by the Chief upon referral from a commanding officer and review of the candidate's resume and history of complaints and sick time. This policy has been sent to HRC for review. Upon the Department's receipt of any comments from the HRC, the policy will be reviewed by the Department's Policy Review Committee and if appropriate, updated accordingly.

#### **Conclusion**

The WPD takes DOJ's allegations seriously and remains committed to reform, including by implementing many of the recommendations made by DOJ. WPD continues its work to build relationships and trust with the public and is proud to serve the Worcester community with integrity, transparency, and fair and unbiased policing. This summary reflects current practices and

upcoming improvements. The Department will continue to provide updates as more enhancements are developed and implemented through various formats, such as a public web page that details the WPD's progress in relation to the individual recommendations made in the CNA Racial Equity Audit and DOJ report.