

Executive Summary: A Proposal for Police Reform in Worcester

By Tom Marino

Prepared for consideration by the Worcester City Council

This is a voluntary policy reform proposal, not a consent decree. The Department of Justice investigated the Worcester Police Department under 34 U.S.C. § 12601, issued a findings report on December 9, 2024, and closed that investigation on August 6, 2026, citing WPD's remedial changes — without imposing a decree and without withdrawing its findings. No federal court oversees this proposal, and none is sought. Every provision is written as a policy the Council can ask WPD to adopt through channels that already exist: the Chief's charter-delegated policy-making authority, the City Manager's budget process, and, where a provision touches the collective bargaining agreements, ordinary labor negotiation. There is no monitor, compliance judge, or contempt mechanism — a deliberate choice.

The proposal is built from DOJ's findings and its nineteen recommended remedial measures; thirteen consent decrees and settlement agreements from other cities, checked against what each one actually delivered; WPD's own current policies; the Massachusetts statewide Model Use of Force Policy approved in March 2026; WPD's 2024 Racial Equity Audit and the Human Rights Commission's still-open recommendations; the full bargaining history between the City and both of WPD's unions; and the City's FY27 budget. Every numbered provision carries a citation to the public document it draws on.

DOJ's report made two full pattern-or-practice findings — excessive force, including against people in behavioral-health crisis, and sexual contact by officers with women suspected of commercial sex work — and three findings it characterized as serious concerns short of that legal conclusion: inadequate investigation of sexual assault reports, a related gender-discrimination concern, and racial disparity in enforcement. This proposal treats all five with equal seriousness regardless of DOJ's hedge on the latter three.

Eight articles organize the response. Article I sets definitions. Article II addresses use of force, building on WPD's own July 2026 rewrite of Policy 400 rather than repeating it — the article identifies what still needs strengthening: canine tracking beyond crowd control, unreported-force detection, an interim reporting timeline ahead of WPD's new records system, and discipline parity for officers who fail to intervene. Article III responds to Worcester's specific fact pattern of officer sexual misconduct during undercover enforcement, and to the department's handling of sexual assault reports generally, drawing heavily on Louisville's and Baltimore's consent decrees. Article IV addresses racial disparity in stops and searches beyond what Policy 400 already covers for use of force, plus the Human Rights Commission's outstanding youth-policy recommendations. Article V rebuilds core accountability mechanisms — a real evidentiary

standard for sustained complaints, anonymous and third-party complaint intake, a disciplinary matrix — while working inside the real constraint of Article 14, the identical internal-affairs clock that binds both of WPD's bargaining units. Article VI addresses supervision, including specialized-unit oversight and span of control. Article VII addresses crisis intervention, building on WPD's existing Co-Response program rather than the more assertive model sought in the pending NAMI lawsuit. Article VIII replaces the idea of a federal monitor with a strengthened version of WPD's own Policy Review Committee, and directs a working group to evaluate independent oversight models — including a municipal Inspector General office — now that the Council has declined to establish a civilian review board.

A recurring theme throughout is crediting what Worcester has already done rather than asking for it twice: the chokehold and canine crowd-control bans, the kettling ban, duty-to-intervene protections, and disaggregated public use-of-force reporting are all WPD's own initiative, not first-time asks. What remains is narrower and more specific than a full decree would suggest.

Five provisions are flagged as bargaining-round items rather than unilateral policy — discipline parity for failing to intervene or failing to report misconduct, the Article 14 disciplinary-charge clock and lookback cap themselves, the disciplinary matrix's escalation structure, and a supervisory-training precondition for existing supervisors — each requiring the Council to direct the City's bargaining team to raise it with one or both unions. On the fiscal side, WPD's FY27 budget is essentially flat, and any provision requiring new spending or positions, principally expanded Co-Response clinical coverage, should be priced and requested through the ordinary budget process rather than presented as costless.

Two matters remain genuinely open: the pending federal ADA lawsuit over crisis response, which this proposal proceeds independently of and which should prompt a revisit of Article VII if it resolves during Council consideration, and the independent-oversight question in Article VIII, whose working group has twelve months to report back once convened.

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What this is. This is a voluntary policy reform proposal, not a consent decree. DOJ investigated WPD under 34 U.S.C. § 12601 and issued a findings report on December 9, 2024; it closed that investigation on August 6, 2026, citing WPD's remedial changes, without imposing a decree and without withdrawing its findings. No federal court oversees this proposal, and none is sought. Every provision is written as a policy the Council can ask WPD to adopt through existing channels — the Chief's charter-delegated policy-making authority, the City Manager's budget process, and, where a provision touches Article 14, ordinary labor negotiation. There is no monitor, compliance judge, or contempt mechanism here — a deliberate choice, not an oversight.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024.
- [2] U.S. Department of Justice, letter closing the Worcester Police Department investigation, August 6, 2026.
- [3] 34 U.S.C. § 12601.
- [44] Charter of the City of Worcester, §§ 3-2, 3-3(a), 3-5.

Where this comes from. This proposal draws on research organized around:

- DOJ's December 2024 findings report and its 19 recommended remedial measures;
- thirteen consent decrees and settlement agreements from other cities, read in full, plus the underlying DOJ findings reports for twelve of those thirteen cities, checked line-by-line against what each city's decree actually delivered;
- WPD's own current policies (Use of Force, Bias-Free Policing and Profiling, Bureau of Professional Standards Investigations, Crisis Intervention Team/Co-Response);
- the Massachusetts statewide Model Use of Force Policy the POST Commission and Municipal Police Training Committee approved in March 2026;
- WPD's 2024 Racial Equity Audit and the Worcester Human Rights Commission's still-open recommendations;
- the full 1997–2025 bargaining history between the City and its patrol officers' union; and
- the City's FY27 Annual Operating Budget.

Every provision below traces to a specific finding, a specific gap in an existing WPD policy, or a specific recommendation Worcester's own Human Rights Commission has already made and

not yet seen adopted. Each provision below carries a "Sources:" note listing the bracketed numbers of the documents it draws on; the full citation for each number is listed in Sources Cited at the end of this document. Only publicly verifiable sources — official documents, decrees, statutes, and public records — are cited; internal working papers used in preparing this proposal are not treated as authority and are not cited here.

How to read the numbering. Each article corresponds to one of DOJ's six remedial categories. Where WPD's current policy already does what DOJ would otherwise call for, this document says so explicitly and does not repeat the request — the goal is to show the Council exactly what has already changed and what genuinely remains, not to pad the proposal with credit WPD has already earned.

A note on "shall" and "should." Provisions directed at WPD use "shall," reflecting the Chief's charter-delegated policy-making authority. Worcester's Charter doesn't name the Police Department specifically, but gives the City Manager authority to organize city agencies (§ 3-2), appoint and remove department heads (§ 3-3(a)), and require employees to act "under general regulations of the city council" (§ 3-5) — the basis on which the Chief promulgates WPD policy; Massachusetts's town-level statute authorizing a chief to make department regulations doesn't apply to a city like Worcester. A few provisions — § 7.2 and § 8.2 — are directed at actors this proposal cannot bind (the City Manager's Office, the Human Rights Commission, the Council) and use "should" to mark a recommendation rather than an instruction WPD can carry out on its own.

Sources:

- [44] Charter of the City of Worcester, §§ 3-2, 3-3(a), 3-5.
- [45] M.G.L. c. 41, §§ 97, 97A.

Findings Map

DOJ's report made two full "pattern or practice" findings and three findings it characterized as serious concerns short of that legal conclusion. This proposal treats all five with equal drafting seriousness — the comparator research is explicit that DOJ's hedge on Findings D and E does not predict how seriously a jurisdiction ends up taking them; that is a drafting choice, and this proposal makes it.

Finding	DOJ's characterization	Addressed in
A. Excessive force, including against people in behavioral-health crisis	Pattern or practice	Article I, Article II
B. Sexual contact by officers with women suspected of commercial sex work, including under threat of arrest	Pattern or practice (14th Amendment)	Article III, Part A
C. Credible reports of sexual assault by officers under threat of arrest	Serious concern	Article III, Part B
D. Inadequate department response to reports of sexual assault; gender-discrimination concern	Serious concern	Article III, Part C
E. Racial disparity in enforcement	Serious concern; not found to be an unlawful pattern at this time	Article IV

Contributing causes DOJ identified — deficient policy and training, inadequate supervision, and accountability-system failures — run through every article below rather than forming a separate chapter; Article V (Accountability) and Article VI (Supervision) address the structural pieces that cut across all five findings.

Articles V through VIII aren't listed above because none maps to a single finding: V and VI address the cross-cutting causes just described, VII implements the behavioral-health infrastructure Article II's Finding A depends on, and VIII is the mechanism by which every other article gets adopted, tracked, and revisited. Their absence reflects that structural role, not a gap in their findings basis.

Article I. Definitions

1.1. "Department" means the Worcester Police Department.

1.2. "Serious Use of Force," "Force," "Chokehold," "De-escalation," "De-escalation Tactics," and "Excessive Force" carry the meanings given them in WPD Policy 400 and, where Policy 400 incorporates it, 555 CMR 6.03.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026.
- [9] 555 CMR 6.03.

1.3. "Sustained" means a disposition, following a Bureau of Professional Standards investigation, that the preponderance of the evidence supports the allegation. This definition replaces the standard-less "sufficient evidence to clearly prove" language in current WPD Policy 500 § 8.C ("Disposition"); see Article V, § 5.1.

Sources:

- [6] WPD Policy 500, *Bureau of Professional Standards Investigations*, § 8.C ("Disposition").

1.4. "Co-Response Program" and "CIT Officer" carry the meanings given them in WPD Policy 448.

Sources:

- [7] WPD Policy 448, *Crisis Intervention Team (CIT) and Co-Response Program*.

1.5. "Policy Review Committee" means the committee WPD established during the DOJ investigation, as described in DOJ's findings report.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024.

Article II. Use of Force and De-escalation

Preliminary note to the Council. WPD's Policy 400, effective July 27, 2026, is a complete rewrite built on the Massachusetts statewide Model Use of Force Policy (approved March 19, 2026). It already contains an outright chokehold prohibition, a canine crowd-control ban, a kettling ban, a duty-to-intervene provision with anti-retaliation protection, and an annual

disaggregated use-of-force analysis and public summary. This article doesn't repeat any of that — it identifies what the comparator decree corpus shows still needs strengthening.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026.
- [8] Massachusetts statewide Model Use of Force Policy (POST Commission and Municipal Police Training Committee), approved March 19, 2026.

2.1. Canine deployment beyond crowd control. Policy 400's canine restriction currently reaches only crowd-control deployments. WPD shall extend bite-ratio and contact tracking to all canine deployments, consistent with the Albuquerque Police Department's settlement agreement, and report canine-contact incidents in the same annual summary Policy 400 § O.6 already requires for other force types.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026, § O.6 ("Annual Analysis and Public Reporting").
- [26] United States v. City of Albuquerque, No. 1:14-cv-01025-JB-JFR (D.N.M.), Third Amended and Restated Court-Approved Settlement Agreement, ¶ 103.

2.2. Photo documentation. WPD's Policy 400 Appendix A requires photo documentation of visible injuries when a complaint of injury is made or an injury is visible. WPD shall extend this requirement to every Serious Use of Force incident as defined in Policy 400, regardless of whether an injury is visible or a complaint is made, consistent with DOJ's remedial measure 2.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 2.

2.3. Unreported-force detection. WPD shall establish a body-worn-camera audit protocol under which the Bureau of Professional Standards randomly cross-checks patrol BWC footage against filed Use of Force Reporting Forms to detect unreported force incidents, and include the results in the annual use-of-force summary required by Policy 400.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026, § O.6 ("Annual Analysis and Public Reporting").

2.4. Production timeline for the disaggregated force-data commitment. Policy 400's annual-reporting requirement is a written commitment as of July 2026, but the records system needed to fully populate it (Hexagon) is twelve to eighteen months from deployment. WPD shall publish, within ninety days of Council adoption, an interim methodology for producing the disaggregated analysis from existing records systems, so the commitment doesn't go unproduced through the transition.

2.5. Duty-to-intervene discipline parity. Policy 400's duty-to-intervene provision requires an officer able to safely do so to stop another officer's excessive force, but leaves the consequence of failing to do so at the same general "up to and including termination" range that applies to most misconduct. WPD shall amend Policy 400 so an officer who fails to intervene is disciplined at the same severity as the underlying use of force, not assessed independently under the general range — modeled on Minneapolis's 2025 Consent Decree ¶ 33. Under the § 5.9 disciplinary matrix, a sustained failure-to-intervene finding is assessed at the underlying violation's severity category, not a separate, generally lower one.

Sources:

- [19] United States v. City of Minneapolis and Minneapolis Police Department, No. 0:25-cv-00048 (D. Minn.), Consent Decree, ¶ 33.

Bargaining-round consideration. Tying a failure-to-intervene officer's discipline to the severity of the violation they failed to stop sets a binding severity outcome for officers in both bargaining units, the same category of change flagged at § 5.9's bargaining-round consideration. As with §§ 5.7, 5.9, and 6.4, the Council should direct the City's bargaining team to raise this standard with NEPBA Local 911 and IBPO Local 504 rather than treat it as fully self-executing WPD policy.

Article III. Officer Sexual Misconduct and Sexual Assault Investigations

Preliminary note to the Council. Part A responds directly to Worcester's own fact pattern — officer sexual contact during undercover sex-trade enforcement — and is substantially original drafting. Parts B and C draw on Louisville's 2025 Consent Decree and Baltimore's 2016 Consent Decree, which produced a strong, victim-centered sexual-assault-response chapter from a DOJ hedge structurally identical to Worcester's Finding D.

Sources:

- [20] United States v. Police Department of Baltimore City and Mayor and City Council of Baltimore, No. 1:17-cv-00099-JKB (D. Md.), Consent Decree.
- [22] United States v. Louisville/Jefferson County Metro Government and Louisville Metro Police Department, No. 3:24-cv-00722-BJB (W.D. Ky.), Consent Decree.

Part A. Prohibition on Sexual Contact in Enforcement Encounters

3.1. No officer, whether on duty, off duty, or acting in an undercover or confidential-informant-handling capacity, may engage in sexual contact of any kind with a person who is a subject, suspect, witness, or informant in any investigation or enforcement encounter, regardless of that person's apparent consent. This prohibition is absolute and admits no exception for investigative necessity.

3.2. WPD's revised policy — limiting undercover enforcement of commercial-sex-work statutes to the common nightwalker statute and eliminating any requirement that a subject enter a vehicle before arrest — is described in WPD's own Summary Report of practices changed since December 2024. It shall be codified in a standalone written policy and reviewed by the Policy Review Committee before final adoption.

Sources:

- [18] Worcester Police Department, Summary Report of practices changed since the December 2024 DOJ findings.

3.3. Undercover and confidential-informant-handling assignments in this enforcement context shall require direct, documented supervisory approval before each operation and a supervisor's contemporaneous review of the operation's conduct afterward — not only after-the-fact incident review.

3.4. WPD shall screen candidates for undercover and vice-unit assignment against their complete BOPS complaint history, not only sustained findings, before assignment, and shall remove from such assignment any officer with a sustained sexual-misconduct finding of any severity.

Part B. Investigation and Discipline of Officer Sexual Misconduct

3.5. WPD shall adopt a standalone officer sexual-misconduct policy, separate from its general professional-standards procedure, defining sexual misconduct broadly to include any sexual contact, sexually motivated contact, or sexual harassment by an officer connected to the officer's official duties.

3.6. Every allegation of officer sexual misconduct shall be jointly reviewed by the Bureau of Professional Standards and the unit responsible for sexual-assault investigations, consistent with DOJ's remedial measure 8. This is modeled on Chicago's division between its independent

civilian-oversight body and its internal-affairs bureau for sexual-misconduct cases, adapted here to Worcester's existing BOPS/Sexual Assault Unit structure rather than a new external body, consistent with this proposal's no-monitor scope.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 8.
- [21] State of Illinois v. City of Chicago, No. 17-cv-6260 (N.D. Ill.), Consent Decree, ¶ 441.

3.7. A sustained finding of officer sexual misconduct involving a member of the public carries a presumption of termination, rebuttable only by the City Manager in a written, public determination stating the reasons for departure from the presumption.

3.8. WPD shall remove any policy or practice — including any requirement that a complainant provide identifying information as a precondition to investigation — that discourages a victim of officer sexual misconduct from reporting, consistent with DOJ's remedial measure 10.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 10.

Part C. Department Response to Reports of Sexual Assault

3.9. WPD shall adopt a trauma-informed sexual-assault investigation policy applicable to patrol officers, Bureau of Professional Standards investigators, and Sexual Assault Unit detectives alike, with trauma-informed interviewing training for every officer in each role. Consistent with Baltimore's 2016 consent decree § XI, the policy shall at minimum require:

- (a) a documented forensic-examination protocol and timely sexual-assault-kit submission and testing;
- (b) assignment of a victim advocate to every report, independent of the investigating officer; and
- (c) a specialized, sufficiently staffed Sexual Assault Unit with dedicated training separate from general Bureau of Professional Standards training.

Sources:

- [20] United States v. Police Department of Baltimore City and Mayor and City Council of Baltimore, No. 1:17-cv-00099-JKB (D. Md.), Consent Decree, § XI ("Handling of Reports of Sexual Assault").

3.10. No sexual-assault report shall be closed as unfounded, or reclassified to a lesser offense, if a victim's or witness's reluctance to continue engaging with the investigation is a contributing factor in that decision, whether or not it is the only factor cited, consistent with DOJ's remedial measure 11.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 11.

3.11. WPD shall establish victim-access protocols to medical and social-service referrals for every sexual-assault report, whether or not the report leads to an arrest, modeled on Louisville's 2025 Consent Decree §IX.

Sources:

- [22] United States v. Louisville/Jefferson County Metro Government and Louisville Metro Police Department, No. 3:24-cv-00722-BJB (W.D. Ky.), Consent Decree, § IX.

3.12. WPD's trauma-informed sexual-assault policy described in its Summary Report as "in development" shall be finalized and reviewed by the Policy Review Committee within one hundred eighty days of Council adoption of this proposal.

Sources:

- [18] Worcester Police Department, Summary Report of practices changed since the December 2024 DOJ findings.

3.13. This proposal considered, and declines at this stage to recommend, an external review panel of outside sexual-assault-response experts of the kind Louisville's DOJ findings report recommended. The declination rests on the Policy Review Committee's composition and independence requirements at § 8.3: a majority of its nine seats sit outside the Chief of Police's unilateral appointment power, with a standing objection channel — a materially different body than an internal WPD committee, weakening the case for a second, external panel. The Policy Review Committee should be assessed after two years for whether it provides adequate independent review of this category before an external panel is revisited.

Sources:

- [31] U.S. Department of Justice, investigative findings report on the Louisville Metro Police Department and Louisville/Jefferson County Metro Government, March 8, 2023, Recommendation 36 ("Establish an External Review Panel").
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Article IV. Bias-Free Policing and Racial Equity

Preliminary note to the Council. WPD's 2024 Racial Equity Audit found, in Findings 9 and 29–31, that WPD's use-of-force and stop data did not capture race and that no disparity-analysis procedure existed. Policy 400's July 2026 rewrite has since adopted a disaggregated annual use-of-force analysis and public summary that substantially answers that finding on the use-of-force side, so this article doesn't re-request it. It addresses what remains: the separate BOPS complaint-database gap (Finding 33, distinct from the use-of-force database), stop-and-search data beyond use-of-force incidents, and the Human Rights Commission's still-open recommendations.

Sources:

- [12] WPD 2024 Racial Equity Audit, Findings 9, 29–31.
- [13] Worcester Human Rights Commission, 2024 request that WPD adopt the Strategies for Youth model policies on youth interaction.

4.1. Stop, search, and citation data. WPD shall expand the disaggregated data-collection and public-reporting model Policy 400 now applies to use-of-force incidents to cover all investigatory stops, searches, and citations, including stops that do not result in an arrest or citation — consistent with DOJ's remedial measure 12 and modeled on Newark's 2016 consent decree stop-data compliance-review cycle. WPD shall publish, within one hundred eighty days of Council adoption, an interim methodology for collecting and reporting this data using existing records systems ahead of the Hexagon system's deployment, consistent with the forcing function § 2.4 already establishes for use-of-force data.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 12.
- [24] United States v. City of Newark, No. 2:16-cv-01731-MCA-MAH (D.N.J.), Consent Decree, § VII.

4.2. Analytic capacity and corrective action. WPD shall conduct a regression-based disparity analysis of the § 4.1 data at least annually and publish the results. Where a disparity is

statistically significant at the 95% confidence level ($p < 0.05$) and reflects a minimum effect size defined in the § 4.1 interim methodology, WPD shall develop a corrective action plan with community input, consistent with DOJ's remedial measures 13 and 14. The plan shall be drafted by the Bureau of Professional Standards and reviewed by the Policy Review Committee (Article VIII) before adoption, routing it through the same accountability structure the rest of this proposal relies on.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measures 13–14.

4.3. Linking the two existing annual reviews. Policy 211 already requires an annual Bureau of Professional Standards Commander review of bias-based-policing complaints; Policy 400 now requires a separate annual use-of-force analysis. WPD shall cross-reference these two reviews in a single public report so the Council and the public can see bias-complaint trends and use-of-force disparity trends together rather than in two disconnected documents.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026, § O.6 ("Annual Analysis and Public Reporting").
- [5] WPD Policy 211, *Bias-Free Policing and Profiling*.

4.4. Youth interaction policies. WPD shall adopt the twelve Strategies for Youth model policies on youth interaction the Human Rights Commission formally requested in 2024, covering stops, use of force involving youth, behavioral-health crisis response for youth, LGBTQ+ youth, data collection, and transparency, within one hundred eighty days of Council adoption of this proposal.

Sources:

- [13] Worcester Human Rights Commission, 2024 request that WPD adopt the Strategies for Youth model policies on youth interaction.

4.5. Juvenile arrest policy. WPD's juvenile arrest policy, nineteen years old as of the 2024 audit and lacking juvenile-privacy protections, shall be revised within one year of Council adoption of this proposal.

Sources:

- [12] WPD 2024 Racial Equity Audit.

Article V. Accountability

Preliminary note to the Council. This article works inside a real, binding constraint on both of WPD's bargaining units: Article 14, unchanged in the patrol contract (NEPBA Local 911) since 1997, and adopted by reference into the superior officers' contract (IBPO Local 504) in 1997–2000 and never touched since. For both patrol officers and sergeants through captains alike, it gives the City six months from investigation-completion to bring disciplinary charges (with a narrow three-month extension for new evidence), bars discipline more than 7.5 years old, and purges written reprimands after one year without a repeat violation.

Provisions below that would require changing Article 14 itself are marked as bargaining-round items, not unilateral policy changes — any such change requires agreement from both unions, since each holds its own separate copy of the same text.

Sources:

- [16] Collective bargaining agreement between the City of Worcester and NEPBA Local 911, Article 14 ("Internal Affairs Investigations").
- [17] Collective bargaining agreement between the City of Worcester and IBPO Local 504, item 10 ("Internal Affairs").

5.1. Evidentiary standard for sustained findings. WPD Policy 500 defines a "Sustained" disposition only as "sufficient evidence to clearly prove the allegations," naming no recognized legal standard. WPD shall amend Policy 500 to require the preponderance-of-the-evidence standard for a Sustained disposition — consistent with Baltimore, Chicago, Louisville, Cleveland, and New Orleans, and with WPD's own Policy 211, which already names an explicit "clear and convincing evidence" standard for POST decertification proceedings.

Sources:

- [5] WPD Policy 211, *Bias-Free Policing and Profiling*.
- [6] WPD Policy 500, *Bureau of Professional Standards Investigations*, § 8.C ("Disposition").
- [20] United States v. Police Department of Baltimore City and Mayor and City Council of Baltimore, No. 1:17-cv-00099-JKB (D. Md.), Consent Decree, ¶ 260(k)(ii).
- [21] State of Illinois v. City of Chicago, No. 17-cv-6260 (N.D. Ill.), Consent Decree, ¶ 467(a).
- [22] United States v. Louisville/Jefferson County Metro Government and Louisville Metro Police Department, No. 3:24-cv-00722-BJB (W.D. Ky.), Consent Decree, ¶ 545(a).

- [25] United States v. City of New Orleans, No. 2:12-cv-01924-SM-DPC (E.D. La.), Second Amended and Restated Consent Decree, ¶ 415(b).
- [29] United States v. City of Cleveland, No. 1:15-cv-01046 (N.D. Ohio), Settlement Agreement, ¶ 224(a).

5.2. Complaint intake. WPD shall permit anonymous complaints, shall not condition complaint intake on the complainant providing identifying or background information, and shall accept complaints filed by a third party on a complainant's behalf, consistent with DOJ's remedial measure 15.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 15.

5.3. Investigation regardless of complainant cooperation. A complaint of serious misconduct shall be investigated to completion regardless of whether the complainant continues to cooperate, consistent with DOJ's remedial measure 16.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 16.

5.4. Duty to report and anti-retaliation. This section has three parts: a reporting deadline, an anti-retaliation presumption, and a discipline-parity standard for officers who fail to report.

(a) *Reporting deadline.* Every officer with direct knowledge of misconduct by another officer shall report it as soon as reasonably possible, no later than the end of the officer's shift or tour of duty absent supervisor-granted extension — matching both East Haven's 2011 Settlement Agreement and Order and the reporting-timeline language WPD Policy 400 already builds in via the Massachusetts statewide Model Use of Force Policy.

(b) *Anti-retaliation presumption.* Harassment, intimidation, or retaliation against an officer who reports misconduct, cooperates with an investigation, or intervenes to stop excessive force carries the same rebuttable presumption of termination § 3.7 applies to sustained officer sexual misconduct, rebuttable only by the City Manager in a written, public determination stating the reasons for departure. This is consistent with East Haven's 2011 Settlement Agreement and Order, which treated retaliation against a reporting officer as a termination-presumption matter rather than an ordinary discipline-range violation.

(c) *Failure-to-report discipline parity.* An officer who fails to report misconduct as required here shall be disciplined at the same severity as if the officer had personally engaged in the underlying misconduct, assessed at the category the § 5.9 disciplinary matrix assigns to it — consistent with Minneapolis's 2025 Consent Decree ¶ 96, which applies the identical standard to officers who witness and fail to report discriminatory conduct.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026.
- [8] Massachusetts statewide Model Use of Force Policy (POST Commission and Municipal Police Training Committee), approved March 19, 2026.
- [19] *United States v. City of Minneapolis and Minneapolis Police Department*, No. 0:25-cv-00048 (D. Minn.), Consent Decree, ¶ 96.
- [30] *United States v. Town of East Haven*, No. 3:12-cv-01652 (D. Conn.), Settlement Agreement and Order, ¶ 15.

Bargaining-round consideration. Part (c)'s parity standard, like § 2.5's, sets a binding severity outcome for officers in both bargaining units and is a bargaining-round consideration alongside §§ 2.5, 5.7, 5.9, and 6.4: the Council should direct the City's bargaining team to raise it with NEPBA Local 911 and IBPO Local 504 rather than treat it as fully self-executing WPD policy.

5.5. Complaint database. The Bureau of Professional Standards complaint database shall be modified to capture officer race, complaint severity — recorded using the severity categories established under the disciplinary matrix required by § 5.9 once adopted — and corrective action taken for every complaint, closing the gap identified in the Racial Equity Audit's Finding 33. This is distinct from and in addition to the use-of-force database improvements Policy 400 already requires.

Sources:

- [12] WPD 2024 Racial Equity Audit, Finding 33.

5.6. Records transparency, preserved. WPD Policy 500's existing prohibition on withholding disciplinary records under the M.G.L. c. 4, § 7, cl. 26(c) public-records exemption is stronger than several comparator cities' pre-reform baselines and is preserved without modification.

Sources:

- [6] WPD Policy 500, *Bureau of Professional Standards Investigations*.
- [10] M.G.L. c. 4, § 7, cl. 26(c).

5.7. Bargaining-round item — not a unilateral policy change. Article 14's constraints bind both of WPD's bargaining units, not only patrol officers. IBPO Local 504 (superior officers,

sergeant through captain) adopted the identical "Internal Affairs" article by reference in its 1997–2000 memorandum of agreement, and no Local 504 agreement since has touched that incorporation. Because each union holds its own separate copy of this text, a change negotiated with one does not automatically apply to the other. The Council should direct the City's bargaining team to raise, in the next round of negotiation with both NEPBA Local 911 and IBPO Local 504 in parallel, whether the six-month disciplinary-charge clock and 7.5-year lookback cap should be revisited in light of this proposal's other accountability provisions. This proposal does not purport to change Article 14 by itself: any such change requires agreement from both unions, not a WPD policy amendment, and negotiating with only one union would leave WPD with two different discipline clocks for patrol officers and their supervisors.

5.8. Citation correction. WPD Policy 448 § 6 cites "Policy 503 (Criminal Investigations)" for constitutional protections during interviews of persons with mental health conditions; no Policy 503 exists in WPD's current manual. WPD shall correct this citation — either to the policy that actually governs interrogation procedure, or by stating the relevant constitutional protections directly in Policy 448 — within ninety days of Council adoption of this proposal.

Sources:

- [7] WPD Policy 448, *Crisis Intervention Team (CIT) and Co-Response Program*, § 6.

5.9. Disciplinary matrix. WPD shall adopt a disciplinary matrix, developed with Policy Review Committee review under Article VIII, that:

(a) sorts sustained Misconduct findings into severity categories, with the lowest category limited to isolated, non-willful violations of minimal impact and excluding any violation involving Use of Force, untruthfulness, bias-based policing, a Stop, Search, or Arrest that violates Policy, or retaliation as described in § 5.4;

(b) sets minimum, presumptive, and aggravated discipline levels for each category above the lowest, drawn from the discipline tiers already established in Policy 500 rather than creating a new disciplinary scale;

(c) increases the presumptive discipline for a category based on an officer's sustained violations within a defined prior period, which shall not exceed the 7.5-year discipline lookback cap set by Article 14 of the collective bargaining agreements covering both NEPBA Local 911 and IBPO Local 504;

(d) sets out mitigating and aggravating factors and expressly prohibits considering an officer's legally protected status as either;

(e) bars substituting non-disciplinary corrective action where the matrix calls for discipline;

(f) requires each sustained finding to be treated as a separate violation for discipline purposes, except that overlapping violations arising from the same conduct may be assessed at the highest applicable category; and

(g) requires the Chief of Police, or the City Manager where Policy 500 requires City Manager approval of the proposed discipline, to justify any departure from the presumptive discipline level — including a downward departure — in a written determination documented in the officer's disciplinary record.

This matrix governs sustained findings generally. It does not narrow the termination presumptions at §§ 3.7 and 5.4(b), which remain WPD's most severe, self-executing category outside the matrix's structure, nor does it displace the discipline-parity standards at § 2.5 (failure to intervene) and § 5.4(c) (failure to report): a sustained finding under either is assessed at the severity category the matrix assigns the underlying violation, not an independent category of its own. It is modeled on Minneapolis's 2025 Consent Decree § 232, adapted to fit within Policy 500's existing discipline-approval structure and Article 14's lookback cap rather than replacing either.

Sources:

- [6] WPD Policy 500, *Bureau of Professional Standards Investigations*.
- [16] Collective bargaining agreement between the City of Worcester and NEPBA Local 911, Article 14 ("Internal Affairs Investigations").
- [17] Collective bargaining agreement between the City of Worcester and IBPO Local 504, item 10, incorporating Article 14.
- [19] *United States v. City of Minneapolis and Minneapolis Police Department*, No. 0:25-cv-00048 (D. Minn.), Consent Decree, § 232.

Bargaining-round consideration. Provisions (b) and (c) above set discipline levels and an escalation structure for officers in both bargaining units and may, like § 6.4, touch matters within the scope of Article 14. As with §§ 5.7 and 6.4, the Council should direct the City's bargaining team to raise the matrix's interaction with Article 14 in the next round of negotiation with both NEPBA Local 911 and IBPO Local 504, rather than treat the matrix as fully self-executing WPD policy where it touches contractual discipline procedure.

Article VI. Supervision

6.1. Body-worn camera activation and review. WPD shall maintain consistent BWC activation requirements across all use-of-force and behavioral-health encounters and shall require supervisory review of BWC footage as part of every Serious Use of Force review, consistent with Policy 400's existing Appendix A checklist and DOJ's remedial measure 18.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 18.
- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026, Appendix A.

6.2. Specialized-unit eligibility and audit. WPD shall establish written eligibility criteria for assignment to specialized units, including the vice/undercover unit implicated in Article III's Finding B, and shall audit specialized-unit assignments and conduct on a regular cadence — consistent with DOJ's remedial measure 19 and modeled on the Early Intervention System structures in Baltimore's and Chicago's consent decrees, configured per those decrees to flag units for elevated risk, not only individual officers.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 19.
- [20] United States v. Police Department of Baltimore City and Mayor and City Council of Baltimore, No. 1:17-cv-00099-JKB (D. Md.), Consent Decree, § XIII.E ("Early Intervention System").
- [21] State of Illinois v. City of Chicago, No. 17-cv-6260 (N.D. Ill.), Consent Decree, § XI.D ("Early Intervention System").

6.3. Supervisory span of control. WPD's FY27 staffing includes 59 budgeted sergeant positions against 366 budgeted patrol officer positions. The Commanding Officer's office shall review this span-of-control ratio at least annually to confirm patrol supervisors retain the capacity to conduct the use-of-force, BWC, and complaint reviews this proposal and Policy 400 already require of them. Where the review finds a unit or shift's ratio is impairing timely review under Article II or Article V, WPD shall report that finding, and any staffing request needed to correct it, to the City Manager as part of the ordinary budget process.

Sources:

- [15] City of Worcester, FY27 Annual Operating Budget.

6.4. Supervisory training. WPD shall require supervisors — sergeants and above with direct reporting authority over patrol officers — to complete training specific to their review responsibilities under this proposal (use-of-force review, BWC audit, complaint intake, and disaggregated-data review) before assuming or continuing in a supervisory role, consistent with the supervisory-competency emphasis across the comparator decree corpus. Because IBPO

Local 504 represents WPD's supervisory personnel, making this a precondition to continuing in an existing role may be a mandatory subject of bargaining under M.G.L. c. 150E rather than something WPD can impose unilaterally; as with § 5.7, the Council should direct the City's bargaining team to raise it with IBPO Local 504 rather than treat it as self-executing for supervisors already in role.

Sources:

- [11] M.G.L. c. 150E.
 - [17] Collective bargaining agreement between the City of Worcester and IBPO Local 504.
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Article VII. Crisis Intervention and Behavioral-Health Response

Preliminary note to the Council. WPD's Policy 448 (Crisis Intervention Team and Co-Response Program), read in full, already builds broad activation criteria, defined officer and clinician roles, and a structured after-hours protocol. It has two real structural limits: a blanket "subject to available resources" qualifier, and a provision that officers retain final force and safety authority throughout a behavioral-health encounter, including over the clinician's own clinical assessment.

The resource constraint is not hypothetical: the City's FY27 budget confirms the Co-Response Program's entire clinical staffing is a single "Social Worker/Clinician" position, funded through Health & Human Services rather than WPD's own budget, with its funding source shifting to only partially tax-levy-backed this fiscal year.

A federal ADA lawsuit filed against the City in March 2026 (NAMI Central Massachusetts, NAMI Massachusetts, and the Parent Professional Advocacy League) seeks a more assertive clinician-first response model than this article proposes. That litigation remains pending as of this proposal's drafting, with no ruling or settlement, and this article proceeds independently of it on the merits documented above.

Sources:

- [7] WPD Policy 448, *Crisis Intervention Team (CIT) and Co-Response Program*.
- [15] City of Worcester, FY27 Annual Operating Budget.
- [32] National Alliance on Mental Illness of Central Massachusetts, Inc. et al. v. City of Worcester, No. 4:26-cv-40084 (D. Mass.), complaint.

7.1. Availability standard, not a staffing quota. WPD shall ensure a CIT officer or Co-Response clinician is available to timely respond to behavioral-health calls meeting Policy

448's activation criteria — consistent with DOJ's remedial measure 5 and with how Chicago's and Albuquerque's decrees ultimately framed the same ask: an availability standard rather than a fixed staffing ratio.

Sources:

- [1] U.S. Department of Justice, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report, December 9, 2024, Remedial Measure 5.
- [21] State of Illinois v. City of Chicago, No. 17-cv-6260 (N.D. Ill.), Consent Decree, ¶ 111.
- [26] United States v. City of Albuquerque, No. 1:14-cv-01025-JB-JFR (D.N.M.), Third Amended and Restated Court-Approved Settlement Agreement.

7.2. Costed expansion of Co-Response clinical capacity. The City should evaluate funding a second Co-Response clinician position and weekend/overnight coverage as a specific, named budget item in the next fiscal year's Health & Human Services and WPD budget requests, rather than treating expanded capacity as contingent on undesignated future resources — a cross-departmental budget request, not a WPD-only line-item change.

7.3. Documentation of force during behavioral-health encounters. Consistent with Article II, any use of force during a behavioral-health encounter shall be documented with the de-escalation strategies attempted and the specific circumstances necessitating force, as Policy 448 § 8 already requires, and shall be included in the annual disaggregated use-of-force summary required under Policy 400.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026, § O.6 ("Annual Analysis and Public Reporting").
- [7] WPD Policy 448, *Crisis Intervention Team (CIT) and Co-Response Program*, § 8.

7.4. Reporting on CIT/Co-Response coverage gaps. WPD shall include, in the annual public use-of-force summary, the frequency with which behavioral-health calls meeting Policy 448's activation criteria were handled without CIT or Co-Response availability, so the Council has a factual basis for evaluating whether § 7.2's expansion is warranted in future budget cycles.

7.5. Documentation when an officer overrides a clinician's assessment. Policy 448 preserves an officer's final force and safety authority during a behavioral-health encounter, including over the on-scene clinician's own clinical assessment. WPD shall require that whenever an officer's determination overrides or departs from a Co-Response clinician's contemporaneous clinical assessment, the officer document the specific basis in the incident report, and shall include the frequency with which this occurred in the annual public use-of-force summary. This provision doesn't change Policy 448's underlying authority structure — a

Council-level policy question this proposal doesn't resolve here, particularly given the pending NAMI litigation — but it makes the exercise of that authority visible rather than undocumented.

Sources:

- [7] WPD Policy 448, *Crisis Intervention Team (CIT) and Co-Response Program*.
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Article VIII. Policy Review and Public Accountability

Preliminary note to the Council. This article deliberately does not create a federal monitor or any compliance-judge mechanism. It builds on a structure that already exists locally: WPD's own Policy Review Committee, established during the DOJ investigation. The Racial Equity Audit's Finding 32 recommended WPD engage the City Manager's Office, the HRC, and the City Council in formal conversations about a civilian oversight body, and the Worcester Research Bureau separately called for a civilian oversight board. Following a City Manager's report recommending against it, the City Council declined to establish one. This article does not revisit that decision. It directs the working group Finding 32 already contemplated to look beyond the civilian-review-board model specifically declined, toward oversight mechanisms more broadly that sit independent of WPD's chain of command — including, as one model to specifically evaluate, a municipal Office of Inspector General: an independently appointed office with investigatory and audit authority that, in the form Massachusetts law already uses at the state level, functions across an entire government rather than within a single department.

Sources:

- [12] WPD 2024 Racial Equity Audit, Finding 32.
- [14] Worcester Research Bureau, proposal for a civilian oversight board.
- [46] City Manager Eric D. Batista, report recommending against establishing a police civilian review board, published July 17, 2026.
- [48] M.G.L. c. 12A (Office of the Inspector General).

8.1. Policy Review Committee cadence and transparency. The Policy Review Committee shall review every provision of this proposal WPD adopts, publish its meeting minutes, and maintain a public log tracking which provisions have been adopted, which are in progress, and which have been declined, with a written reason for any declination.

8.2. Independent oversight working group. The City Manager's Office, the Human Rights Commission, the City Council, and WPD should convene the working group the Racial Equity Audit's Finding 32 recommended, to evaluate oversight mechanisms independent from WPD's chain of command, within one hundred eighty days of Council adoption. Because the Council has declined to establish a civilian review board, the working group's charge is not limited to that

model. It shall specifically evaluate a municipal Office of Inspector General — modeled on the independence and investigatory authority M.G.L. c. 12A gives the state Inspector General, adapted to city government — alongside any other independent oversight model it considers relevant, including a reconsidered civilian review board if circumstances change. The working group shall report its findings and recommendations to the Council no later than twelve months after convening, so evaluating independent oversight remains a step toward a decision rather than an indefinite standing exercise.

Sources:

- [14] Worcester Research Bureau, proposal for a civilian oversight board.
- [48] M.G.L. c. 12A (Office of the Inspector General).

8.3. Policy Review Committee composition, appointment, and independence. The Policy Review Committee shall consist of nine members:

(a) The Chief of Police, who shall chair the Committee and shall vote only to break a tie among the other eight members;

(b) Two WPD members selected by the Chief of Police;

(c) One member selected by the Chief of Police from a list of three individuals nominated by the President of NEPBA Local 911;

(d) One member selected by the Chief of Police from a list of three individuals nominated by the President of IBPO Local 504;

(e) The Chair of the Human Rights Commission, or an HRC member of the Chair's designation;

(f) One member selected by the Mayor;

(g) One member selected by the Vice Chair of the City Council; and

(h) One member selected by a vote of the nine City Council members other than the Mayor and Vice Chair, from among individuals nominated by members of the Council.

Each of the eight members described in (b) through (h) shall serve a three-year staggered term, removable before term's end only by the authority that appointed or selected them — the Chief of Police for seats (b) through (d), the Human Rights Commission for seat (e), the Mayor for seat (f), the Vice Chair of the City Council for seat (g), and the nine-member Council voting body for seat (h) — and only for cause stated in writing to the Council.

The Committee's existence, composition, and review responsibilities under this proposal shall not be alterable by WPD alone. Any person may raise an objection concerning the Committee's composition, independence, or operation; it shall be submitted to the City Manager's Office and the Council, which shall review and respond in writing within ninety days — a channel for these concerns to be heard on an ongoing basis, separate from the one-time working-group review in § 8.2.

8.4. Annual public reporting consolidation. WPD publishes, or will publish under this proposal, several distinct annual public reports: the Policy 400 use-of-force summary, the Policy 211 bias-based-policing review, and (under Article IV) the stop-and-search disparity analysis. WPD shall publish these together, on a single annual schedule, on the department's website, so the public and the Council can review the department's full accountability picture in one place rather than three.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026, § O.6 ("Annual Analysis and Public Reporting").
 - [5] WPD Policy 211, *Bias-Free Policing and Profiling*.
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Implementation Notes for the Council

These notes are not numbered provisions. They summarize feasibility, cost, and political considerations the underlying research surfaced, so the Council can weigh adoption with full information.

Fiscal context. WPD's FY27 operating budget is \$62,192,427, a 1.9% decrease from FY26, with total sworn and civilian positions falling to 533 and no net new positions planned. Public Safety as a whole is 12.6% of the City's total FY27 budget. A \$5 million capital loan order for the Police Headquarters roof is already the largest capital item tied to WPD this cycle, and the City's own contingency fund fell 34.6% citywide, described in the budget narrative as due to funding constraints. None of the provisions above requiring new capital spending or new positions — principally § 7.2 — should be presented as low-cost; they should be priced and requested explicitly in the ordinary budget process.

Sources:

- [15] City of Worcester, FY27 Annual Operating Budget.

Labor relations. Five provisions in this proposal are flagged as bargaining-round items rather than unilateral WPD policy changes:

- Article II § 2.5 — the failure-to-intervene discipline-parity standard;
- Article V § 5.4(c) — the failure-to-report discipline-parity standard;
- Article V § 5.7 — the discipline clock and lookback cap themselves;
- Article V § 5.9's bargaining-round consideration — the disciplinary matrix's escalation structure; and
- Article VI § 6.4 — the supervisory-training precondition for existing IBPO Local 504-represented supervisors.

Each requires the Council to direct the City's bargaining team to raise the item with NEPBA Local 911, IBPO Local 504, or both, depending on the provision. Every other provision is implementable through the Chief's charter-delegated policy-making authority, though several — Articles III and V in particular — will be subject to the ordinary grievance process if implementation is contested.

Sources:

- [44] Charter of the City of Worcester, §§ 3-2, 3-3(a), 3-5.

What Worcester has already done. This proposal is written to credit, not duplicate, WPD's own post-2024 reforms: the July 2026 Policy 400 rewrite adopting the state's model use-of-force policy, the revised undercover sex-trade enforcement policy, increased body-worn-camera audits, a specialized-unit selection policy already in some form, and a records system (Hexagon) expected within 12–18 months. Council members should understand that several of the strongest-sounding provisions in comparator cities' consent decrees — an outright chokehold ban, a canine crowd-control ban, disaggregated public use-of-force reporting — are things Worcester has already adopted on its own initiative, not first-time asks. That is a genuine political asset: this proposal can be framed as building on demonstrated progress, not as a response to inaction.

Sources:

- [4] WPD Policy 400, *Use of Force*, effective July 27, 2026.
- [8] Massachusetts statewide Model Use of Force Policy (POST Commission and Municipal Police Training Committee), approved March 19, 2026.
- [18] Worcester Police Department, Summary Report of practices changed since the December 2024 DOJ findings.

What remains genuinely open. The NAMI Central Massachusetts / NAMI Massachusetts / Parent Professional Advocacy League ADA lawsuit remains pending as of this proposal's drafting, with no rulings or settlement. Article VII proceeds independently of it; if the litigation resolves while this proposal is under Council consideration, Article VII should be revisited against whatever outcome results.

Sources:

- [32] National Alliance on Mental Illness of Central Massachusetts, Inc. et al. v. City of Worcester, No. 4:26-cv-40084 (D. Mass.), complaint.
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Sources Cited

Each provision's "Sources:" note gives the full title of the document it draws on and, where a specific section, paragraph, or finding number applies, that pinpoint citation. This section lists every source in full, grouped by category and keyed by the same bracketed numbers used throughout the document. Each is a public, independently verifiable document — an official finding, a policy WPD has adopted, a statute or regulation, a public record, or a court filing — not an internal work product. Internal research memoranda used in preparing this proposal are not cited as authority anywhere in it.

Federal and DOJ sources

[1] U.S. Department of Justice, Civil Rights Division and U.S. Attorney's Office for the District of Massachusetts, *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts*, findings report issued December 9, 2024.

[2] U.S. Department of Justice, letter closing the Worcester Police Department investigation, August 6, 2026.

[3] 34 U.S.C. § 12601 (federal statute authorizing DOJ pattern-or-practice investigations of law enforcement agencies).

Worcester city and WPD sources

[4] WPD Policy 400, Use of Force, effective July 27, 2026.

[5] WPD Policy 211, Bias-Free Policing and Profiling.

[6] WPD Policy 500, Bureau of Professional Standards Investigations.

[7] WPD Policy 448, Crisis Intervention Team (CIT) and Co-Response Program.

[12] WPD 2024 Racial Equity Audit, prepared with the Worcester Human Rights Commission (Findings 9, 29–33).

[13] Worcester Human Rights Commission, 2024 request that WPD adopt the Strategies for Youth model policies on youth interaction.

[14] Worcester Research Bureau, proposal for a civilian oversight board (referenced in WPD's 2024 Racial Equity Audit, Finding 32, as a matter for further City Manager's Office / HRC / Council conversation).

[15] City of Worcester, FY27 Annual Operating Budget.

[46] City Manager Eric D. Batista, report to the Worcester City Council recommending against establishing a police civilian review board, published July 17, 2026.

[18] Worcester Police Department, Summary Report of practices changed since the December 2024 DOJ findings (the source WPD's own account of its revised undercover sex-trade enforcement policy, its trauma-informed sexual-assault policy in development, and the Hexagon records-system timeline).

[44] Charter of the City of Worcester, §§ 3-2 ("Powers and Duties" of the City Manager), 3-3(a) ("Appointments and Removals"), and 3-5 ("Regulations").

Massachusetts statutes, regulations, and the state model policy

[8] Massachusetts Police Officer Standards and Training (POST) Commission and Municipal Police Training Committee, statewide Model Use of Force Policy, approved March 19, 2026.

[9] 555 CMR 6.03 (POST Commission use-of-force regulations).

[10] M.G.L. c. 4, § 7, cl. 26(c) (public-records exemption referenced in Policy 500's records-transparency provision).

[11] M.G.L. c. 150E (Massachusetts public-sector collective bargaining law).

[45] M.G.L. c. 41, §§ 97, 97A (town-level statute authorizing a police chief to make department regulations, subject to selectmen approval, upon town-meeting acceptance; by its terms applies to towns, not cities, and does not apply to Worcester).

[48] M.G.L. c. 12A (Office of Inspector General; establishes the Massachusetts state Inspector General's independence and investigatory authority — cited here as an existing Massachusetts model for an independent oversight office, not as a source of authority over WPD).

Collective bargaining agreements

[16] Collective bargaining agreement between the City of Worcester and NEPBA Local 911 (successor to IBPO Local 378), Article 14 ("Internal Affairs Investigations"), originating in the 1997 agreement and unamended through the successor memoranda of agreement filed through 2025. On file with the City of Worcester and NEPBA Local 911.

[17] Collective bargaining agreement between the City of Worcester and IBPO Local 504, 1997–2000 memorandum of agreement, item 10 ("Internal Affairs"), incorporating by reference the Article 14 text identified at [16]. On file with the City of Worcester and IBPO Local 504.

Consent decrees and settlement agreements (comparator corpus)

[19] United States v. City of Minneapolis and Minneapolis Police Department, No. 0:25-cv-00048 (D. Minn.), Consent Decree, filed January 6, 2025 (¶¶ 33, 96, 232).

[20] United States v. Police Department of Baltimore City and Mayor and City Council of Baltimore, No. 1:17-cv-00099-JKB (D. Md.), consent decree, filed January 12, 2017 (§§ XI, XIII.E).

[21] State of Illinois v. City of Chicago, No. 17-cv-6260 (N.D. Ill.), consent decree.

[22] United States v. Louisville/Jefferson County Metro Government and Louisville Metro Police Department, No. 3:24-cv-00722-BJB (W.D. Ky.), Consent Decree, 2025 (§ IX).

[24] United States v. City of Newark, No. 2:16-cv-01731-MCA-MAH (D.N.J.), consent decree, 2016 (§ VII).

[25] United States v. City of New Orleans, No. 2:12-cv-01924-SM-DPC (E.D. La.), second amended and restated consent decree.

[26] United States v. City of Albuquerque, No. 1:14-cv-01025-JB-JFR (D.N.M.), Third Amended and Restated Court-Approved Settlement Agreement, approved June 2, 2023.

[29] United States v. City of Cleveland, No. 1:15-cv-01046 (N.D. Ohio), Settlement Agreement, submitted May 26, 2015 and entered by the court June 12, 2015.

[30] United States v. Town of East Haven, No. 3:12-cv-01652 (D. Conn.), Settlement Agreement and Order, filed November 20, 2012 and approved by the court December 21, 2012, following DOJ's December 19, 2011 findings letter.

DOJ findings reports for comparator cities

All twelve of these were reviewed directly and checked against the corresponding decree text; only Louisville's [31] is quoted for a specific claim in the operative provisions above, but all

twelve are listed here so the "Where this comes from" claim is fully supported by this citation apparatus.

[31] U.S. Department of Justice, Civil Rights Division, investigative findings report on the Louisville Metro Police Department and Louisville/Jefferson County Metro Government, issued March 8, 2023.

[33] U.S. Department of Justice, Civil Rights Division, *Investigation of the Albuquerque Police Department*, findings report, April 10, 2014.

[34] U.S. Department of Justice, Civil Rights Division, *Investigation of the Baltimore Police Department*, findings report, August 10, 2016.

[35] U.S. Department of Justice, Civil Rights Division, *Investigation of the Chicago Police Department*, findings report, January 13, 2017.

[36] U.S. Department of Justice, Civil Rights Division, *Investigation of the Cleveland Division of Police*, findings report, December 4, 2014.

[37] U.S. Department of Justice, Civil Rights Division, *Investigation of the East Haven Police Department*, findings report, December 19, 2011.

[38] U.S. Department of Justice, Civil Rights Division, *Investigation of the Ferguson Police Department*, findings report, March 4, 2015.

[39] U.S. Department of Justice, Civil Rights Division, *Investigation of the Minneapolis Police Department*, findings report, June 16, 2023.

[40] U.S. Department of Justice, Civil Rights Division, *Investigation of the Newark Police Department*, findings report, July 22, 2014.

[41] U.S. Department of Justice, Civil Rights Division, *Investigation of the New Orleans Police Department*, findings report, March 16, 2011.

[42] U.S. Department of Justice, Civil Rights Division, *Investigation of the Portland Police Bureau*, findings report, September 12, 2012.

[43] U.S. Department of Justice, Civil Rights Division, *Investigation of the Seattle Police Department*, findings report, December 16, 2011.

Pending litigation

[32] National Alliance on Mental Illness of Central Massachusetts, Inc., National Alliance on Mental Illness of Massachusetts, Inc., and Parent Professional Advocacy League, Inc. v. City of Worcester, No. 4:26-cv-40084 (D. Mass., Central Division), federal ADA/disability-discrimination complaint, filed March 16, 2026, pending as of this proposal's drafting.