



The Research Bureau

OVERDUE FOR CIVILIAN OVERSIGHT

A Pathway for Lasting Police Reform

REPORT 25-11

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EXECUTIVE SUMMARY

Civilian oversight of police has been debated in Worcester for more than half a century. Beginning with the creation of the Human Rights Commission in 1970, successive decades have seen renewed calls for independent review in response to high-profile incidents and broader concerns about accountability. Despite these repeated discussions, Worcester has not established a civilian oversight body.

Today, Worcester stands as the 114th largest city in the United States and the second largest in New England, yet it remains one of the few major cities in the nation without a civilian review board or comparable oversight structure. More than half of the 200 largest U.S. cities have adopted such mechanisms, and within the region, Boston, Providence, Cambridge, Hartford, and New Haven all operate oversight entities. Worcester's absence is striking in this context—and even more so in light of the December 2024 U.S. Department of Justice findings report, which identified systemic weaknesses in the city's internal accountability systems.

KEY FINDINGS

- **A history of revisited but unrealized proposals.** Calls for oversight arose in the 1970s, 1990s, 2000s, and 2010s, typically following incidents or investigations that drew public concern. Each effort generated discussion but ultimately did not result in permanent structures.
- **Oversight is widespread nationally.** Research shows that a majority of large U.S. cities operate with an oversight entity, ranging from review boards to investigatory or hybrid models. Worcester is noticeably absent among its peers.
- **Current systems may fall short of best oversight practices.** Worcester has systems for oversight—such as the Bureau of Professional Standards, the Human Rights Commission, the Investigations Division of the Executive Office of Diversity, Equity and Inclusion, and the state POST Commission—but individually each lack some of the principles that define effective civilian oversight.
- **Principles of effective oversight are well-established.** National research emphasizes independence, investigatory authority, sustained resources, and open reporting as the foundation of trust and legitimacy.

The Worcester Regional Research Bureau recommends that the City of Worcester establish a civilian oversight entity to strengthen accountability and rebuild public trust. Civilian oversight does not by itself guarantee

changes in problematic practices; however, it ensures that violations of law or residents' rights are brought into the open, creating an essential layer of accountability, transparency, and democratic governance.

MINIMUM FEATURES OF EFFECTIVE OVERSIGHT

To be credible and effective, any civilian oversight entity in Worcester must be built with certain baseline features: operationalizing national principles of independence, transparency, and accountability while adapting them to local needs. At a minimum, these include:

1. **Clear Jurisdictional Authority and Discretion:** Explicit power to investigate or review cases, prioritize serious complaints and mediate where appropriate.
2. **Scope and Execution of Investigations:** Clearly defined relationship with internal police processes, avoiding duplication while ensuring independent oversight of serious cases.
3. **Independent Investigative Capacity:** Professional investigators and staff with authority to go beyond second-guessing police inquiries.
4. **Sufficient and Sustained Budget:** Predictable funding, insulated from political shifts, so resources cannot be cut when findings prove inconvenient.
5. **Selection and Appointment of Members:** Multi-step or multi-authority appointment process to reduce political capture and reinforce independence.
6. **Limits on Police Representation:** Civilian-dominated membership, with restrictions on current or former law enforcement to preserve independence.
7. **Representative and Inclusive Membership:** Reflects Worcester's diverse residents and districts.
8. **Member Training Requirements:** Structured training in police policy, civil rights, and investigative standards for informed, consistent decisions.
9. **Access to Police Data Systems:** Routine access to complaints, use-of-force reports, and internal records to support investigations and spot systemic patterns.
10. **Subpoena Power:** Ability to compel testimony and obtain records, ensuring oversight is substantive, not symbolic.
11. **Transparency in Investigation Results:** Public release of findings and dispositions whenever possible, balanced with confidentiality.
12. **Regular and Public Reporting:** Annual or quarterly reports on cases, trends, and recommendations for city leadership and the public.
13. **Community Listening and Engagement:** Active public education, input, and accessibility across neighborhoods.
14. **Handling of Disciplinary Recommendations:** Police leadership must respond formally, explaining whether recommendations are adopted and why.



INTRODUCTION

Despite the fact that governments in the United States consist of representatives elected by the people and administrators appointed by those representatives, calls for civilian oversight of the police are not uncommon. While the ultimate “boss” of a local police department is a Mayor, City Manager, or a Town or County Administrator, an additional layer of civilian oversight is often desired among community residents. In that case, **civilian oversight is really referring to a review board or agency, filled with or staffed by members or employees that are not also police officers, empowered to investigate complaints about the department or individual officers, and in some cases to help the Police Department, City Council, and other members of community government create policies meant to guide police and prevent future complaints.**¹

When a community calls for civilian review, what they are really looking for is an additional level of public oversight or shared governance of the police, feeling that something, somewhere down the line of responsibility, has somehow failed them. While it might not always be directly true that a community has been “failed,” even the *perception* of failure can damage the trust between the public and its police department. Rebuilding that trust might require democratic oversight.

In Worcester, various individuals and organizations have called for civilian oversight of law enforcement for many years, stretching back at least as far as 1970. These calls have often occurred after a high-profile event involving the police. The December 2024 release of the Department of Justice’s Pattern-or-Practice review of the Worcester Police Department is the most recent such event. In March 2025, the City Manager communicated to City Council that he had asked the Worcester Regional Research Bureau to perform an independent review and release a report on civilian review boards. This is that review.

Conducting the research on this report shed light on the effective principles of these boards, the history of requests for them in Worcester, and the practices that the Research Bureau believes would provide a sound foundation for one in Worcester. In most of the instances in which the public called for a board in the City, officials and policymakers have asked the community to wait while other reforms run their course. Given that this conversation has happened repeatedly, it is well worth considering whether now is the time for an oversight agency. **In that light, the Research Bureau does recommend that the City of Worcester create a civilian oversight agency, within the bounds of municipal and state law.**

On the following pages, this report will: **(1)** define civilian oversight locally and nationwide in principle and practice, **(2)** examine the history of civilian police oversight in Worcester, including current investigatory mechanisms, and **(3)** present models and ideas of oversight nationwide that the Bureau believes a local board in Worcester should exhibit as far as local and state law will allow. While such laws differ from municipality to municipality, and state to state, the principles and effective practices undergirding these systems can be adapted to any community regardless of how it is run.

SECTION 1: WHAT IS CIVILIAN OVERSIGHT OF LAW ENFORCEMENT?

Most people know police departments are responsible for enforcing laws, responding to crime, and investigating misconduct within their own ranks. Many assume that when officers are accused of wrongdoing, the department’s internal affairs unit will handle the investigation and, if necessary, apply discipline. But in some communities, repeated incidents—such as allegations of discrimination against protected groups, violations of free speech rights, or skepticism about the fairness of internal investigations—have weakened public trust. In response, municipal leaders and community members often turn to **external police oversight and accountability** to ensure policing is reviewed independently.

One of the most common—and most discussed—forms of external police oversight is the civilian review board. **Civilian review boards (CRBs) are a method for community members to review police conduct from outside the department.** In this report, the term “CRB” is used broadly to refer to any external police oversight and accountability entity or system.

They are called “civilian” because they are independent from the police chain of command. In practice, CRBs take many different forms, and there are a variety of ways communities have operationalized external oversight—ranging from boards that conduct or review completed investigations into alleged misconduct by officers, to inspector general offices with the authority to conduct their own inquiries, to hybrid systems that combine several oversight functions.



FOUR MODELS OF CIVILIAN OVERSIGHT

The National Association for Civilian Oversight of Law Enforcement (NACOLE) is a leading organization dedicated to studying, analyzing, and advancing the field of civilian oversight. Their research and training help communities understand the range of models available and how these systems can be tailored to local needs. While each is shaped by local government structure, political will, and identified reform priorities, they broadly fall into four types:

1) **Investigatory entities are boards or agencies empowered to directly investigate allegations of police misconduct.**

They often handle complaint intake from the public, conduct their own interviews, gather evidence, and review body-worn camera footage or other records. In some cases, they are granted subpoena power to compel testimony and produce documents, making them less dependent on the police department's cooperation. Investigatory bodies are typically expected to produce findings and recommendations for the department's leadership, city leadership, or both. In some jurisdictions, they may even participate in deciding discipline, giving them a direct role in holding officers accountable.

2) **Review models focus on evaluating completed internal affairs cases after the police department has concluded its own investigation.**

These boards or commissions examine whether the investigation was thorough, fair, and consistent with policy. They may have authority to make the results of discipline public, highlight trends in misconduct cases, and sometimes deem an investigation insufficient. However, they do not typically conduct their own independent investigations—police processes remain internal. Their value lies in providing an external check on quality and fairness, as well as offering community input on how cases are handled.

3) **Auditors or Monitors are usually permanent offices—sometimes a single monitor, sometimes a staffed agency—that examine systemic issues within a police department, but are themselves not staffed by or within the law enforcement agency.**

Rather than investigating individual cases, they focus on auditing compliance with policy changes mandated by city leadership or reform agreements, such as consent decrees. They identify patterns in civilian complaints, flag broader policing practices that may violate constitutional rights or undermine public trust, and assess the quality of police investigations. Their reports often go directly to policymakers, with recommendations for systemic reforms in policy, training, and supervision.

4) **Hybrid models combine elements of two or more oversight types to expand authority and flexibility.** For

example, a hybrid system might create an investigatory agency with professional investigators, staff, and resources to conduct independent investigations, while also taking on auditing responsibilities—monitoring policy changes, tracking the department's compliance with council ordinances or executive actions, and publicly reporting on those findings. This structure allows the agency to address both individual misconduct cases and broader systemic issues. Many oversight systems also pair a professional office of staff, responsible for conducting investigations and producing reports, with a separate appointed board of commissioners that reviews those findings and makes final decisions or recommendations. Hybrids became increasingly common in the 1990s, alongside the rise of auditor/monitor agencies, and remain popular today. Their appeal lies in creating a layered oversight system with checks and balances, multiple tools to promote accountability, and the ability to respond to evolving community concerns while adapting to changing policing challenges.

Historically, civilian oversight in the U.S. has developed in waves: early police commissions in the late 1800s–1920s; under-resourced review boards from the 1920s–1960s; investigative agencies emerging in the 1970s–80s; and the rapid expansion of auditor, monitor, and hybrid agencies from the 1990s onward, particularly after the 1991 Rodney King beating ([De Angelis, Rosenthal, & Buchner, 2016](#)). Many cities have also proposed CRBs in response to the murder of George Floyd in 2020.

Prior research has found that most civilian oversight agencies form in response to crises—especially incidents

involving police use of force (49%) and racially biased policing (~30%)—rather than as proactive policy measures, with only about 11% created without a precipitating critical incident ([Walker, 2001](#)).

STANDARDS FOR EFFECTIVE CIVILIAN OVERSIGHT: NACOLE'S 13 GUIDING PRINCIPLES

In part because of the different reasons for their creation, in part because of very different local contexts, and in part because their models can differ, every law enforcement oversight agency is going to differ slightly to meet local needs. However, the NACOLE and the Department of Justice's Community Oriented Police Services (COPS) and Office of Justice Programs (OJP) have collected what they call "effective practices" that help strengthen the oversight abilities of agencies anywhere. These practices are built out of surveys and case studies undertaken in the mid-2010s of civilian oversight of the police in the United States, as well as from various scholars that have long studied these same organizations. These agencies should aim, as far as they can in their creation, by-laws, and day-to-day work to embody these principles and practices to



the best of their ability—which will be explained further below.

The specific principles to be discussed below were drawn largely from *Civilian Oversight of Law Enforcement: Assessing the Evidence*, first published in 2016. That report concludes a study done of 97 oversight agencies throughout the United States, as well as its own review of the civilian oversight literature (De Angelis, Rosenthal, and Buchner 2016, 9). The purpose of this work was “to help local policy-makers, police executives, and members of the local community explore the key issues that can accompany the implementation and sustainability of civilian oversight of police mechanisms at the municipal and county level” (2016, 5). Specifically, the report considered “an assessment of the key factors that promote organizational effectiveness in civilian oversight,” **ultimately assembling a list of 12 effective practices embodied by a variety of these agencies** (2016, 5). When building a system of civilian oversight, the report stressed that “jurisdictions should focus on the ‘best-fit’ rather than ‘best practice,’” as some municipalities may face political or legal constraint that prevents them from adopting all of the practices listed below to their maximum extent; “some” is better than nothing, in other words (2016, 11). Those building a new agency should focus on embodying what they can that is appropriate to local circumstances. The twelve practices described therein are as follows, each followed by a brief description as well as the page number of the practice:

1) Independence. The oversight agency should have some **independence to follow through on its oversight without interference**. What this means can differ from community to community, and different agencies will have different degrees of independence. Structural independence, for example, means that the agency has some degree of separation from the local police, including conducting its own investigations (even concurrent investigations are a form of independence). Independence can also mean creating protections for the agency so that shifting political winds cannot easily eliminate it or its officers. (2016, 37)

2) Adequate Jurisdiction and Authority. This is considering what oversight agencies can actually look into, and, subsequently, what they can do about them. For example, are they limited *only* to reviewing and investigating civilian complaints that are brought directly to them? Or can they investigate other incidents – such as officer-involved shootings or accidental gun discharge? **Putting the scope of jurisdiction into the law that forms the agency can help prevent future questions about an agency’s limits, and leaves little to interpretation.** (2016, 38)

3) Unfettered Access to Records. While the course of an investigation can take many different paths, including interviewing the complainant, the defendant, and other witnesses, there are inevitably going to be records of the incident managed by the local police department (or another agency), such as internal affairs files or body-worn camera footage. In some oversight models, the investigators or directors of the agency are given direct access to these records; in others, they need the cooperation of the police departments to provide that access. **Agencies with greater access to records will likely have an easier time conducting reviews or investigations.** (2016, 39)

4) Access to Law Enforcement Executives and Internal Affairs Staff. This principle is “**the extent to which oversight actors have the ability to influence appropriate law enforcement officials**” (2016, 39). Does the police chief and any appropriate internal affairs staff listen to the recommendations provided by the oversight agency? Do they voluntarily engage in conversation or are they required to? How often do they put the oversight recommendations into actual practice?

5) Full Cooperation. This principle really combines aspects of the previous two. The oversight agency may have some access to appropriate records, and it may engage in conversation with police chiefs or their equivalents, but does it generally have the full cooperation of the police department? What about other municipal agencies that the agency might have to work with? The report notes that sometimes agencies pursue (1) voluntary agreements for cooperation with local law enforcement, (2) have full cooperation as a condition of the ordinance that formed it, or (3) have (2) plus sanctions for non-cooperation. (2016, 40)

6) Support from Process Stakeholders. An agency that exists but does so without actual support from those in positions of power is not going to last very long or be very effective. If the city council, city manager, mayor, or whoever appoints members to the agency does not do so in a timely fashion, for example, the work of the agency is going to falter. If local police executives or city attorneys do not support the work of the agency, it is going to have difficulty as well. **Essentially, an oversight agency needs institutional buy-in from the municipality; it is not enough to create one and hope it works, it needs to have some degree of support as well.** (2016, 40-41)

7) Adequate Resources. Budget and staffing are key parts of an oversight agency’s ability to function, though every model of agency is going to have a different “adequate” amount. For example, an appropriate budget for an oversight agency can allow it to hire investigators and a



professional staff to do its own investigations, rather than relying on staff provided from other departments in the city. **The amount to be budgeted – or that a budget is to be expected – should be laid out in the ordinance creating the agency, ensuring that the board is not subject to political winds** (2016, 41-42). A helpful rule is to establish a budget that is a percentage of the police department's or police salaries, so that it grows and shrinks as the police does. There is no hard and fast rule about how much an agency should have, as it depends a lot on what kind of board is built. NACOLE found that most of the agencies it surveyed had budgets equal to 0.5% or less of the police department budget, and a few had up to 1% (Vitoroulis et al. 2021, 47–49). An alternative to a percentage budget, again depending on the agency's set up, is to hire investigators at a ratio to the number of sworn officers – for example, one for every 100 officers (2021, 50).

8) Public Reporting or Transparency. The oversight agency should report on the status and outcomes of its work, to build public trust. If the outcomes of complaints are never known, residents might hesitate to reach out at all to the agency. (2016, 42)

9) Pattern Analysis. Similar to public reporting, an agency can do a lot of public trust-building **if it analyzes patterns of complaints publicly**. This can mean the types of complaints, how many are sustained, and whether the law enforcement agency followed recommendations or not. (2016, 42)

10) Community Outreach. An oversight agency can only be effective if it is actually proactively used by members of the community. Its true of government in general, and of local government even more so, that residents might not be aware of all of the things that it might offer. A place to post complaints might be highly desired by some members of the community, but there might be other people who would use it if they knew it existed. Therefore, another effective principle of oversight agencies is simply **making their presence known in the community** through various outreach activities, to groups, individuals, and other populations. (2016, 42-43)

11) Community Involvement. Involving the community in the oversight agency's work can be another way to build public trust. One example of this might be using volunteer mediators in resolving complaints; another might be reserving a seat on the board for a community-recommended member (2016, 44)

12) Respect for Confidentiality Agreements. An oversight agency's goal is not to "name and shame" the subject of complaints, and it should, to whatever extent

possible, protect the confidentiality of personnel records. (2016, 44)

To these twelve principles, a later NACOLE and COPS report, Civilian Oversight of Law Enforcement: Report on the State of the Field and Effective Oversight Practices adds a thirteenth:

13) Procedural Justice and Legitimacy. In interacting with the public, and looking into their complaints, **an oversight agency should be willing to listen to public concerns, looking to earn its trust, be objectively neutral, and treat all individuals with dignity and respect**. If an oversight agency loses its legitimacy – whether in the eyes of the public or local law enforcement – it is likely to have a much harder time receiving complaints, conducting investigations, and pursuing its inquiries. (Vitoroulis et al. 2021, 72–74) In the course of its investigations, an agency should be sure to provide due process protections to any who have been accused, as well (Ofer 2016, 1050).

NACOLE, COPS, and OJP studies have found that these principles exist, to some degree, in many of the oversight agencies under study. No agency is going to perfectly embody each of these principles. For example, while most agencies have some kind of independence, that independence is going to vary based on the type of agency and local circumstances. "Review" agencies, for example, might not have their own teams of independent investigators, while an auditor or inspector general might require some form of independent investigation. Nor will the adoption of these principles ensure the smooth operation of an agency, as a 2024 report, Impediments and Challenges to Civilian Oversight of Law Enforcement, suggests (Schaible 2024).²

It is as the 2016 report suggested: the creation of oversight agencies in a community should focus on "best-fit," taking into account local political and historical circumstances, using these principles as far as they can in context. Embodying all of the principles above does not mean that an agency will be effective at what it does if it simply cannot meet the needs of the community it was created to serve. It is worth considering how to adapt these principles to civilian review in Worcester.

FROM PRINCIPLES TO PRACTICE: POWERS AND STRUCTURES OF CIVILIAN OVERSIGHT IN U.S. CITIES

Civilian review of the police is not uncommon in the United States' most populous cities. According to research by NACOLE and the University of Colorado Denver (July 19, 2024), just over half (56 percent) of the 200 most populous U.S. cities had established a civilian oversight entity for police as of Fall 2023. Based on the most recent Census Bureau annual population estimates, Worcester

ranked 114th as of July 1, 2024—placing it just outside Tier 1 status. As an aside, there are a number of southern New England municipalities that have or had civilian review agencies; most of these communities are outside of the top 200 cities by population in the US. Boston (rank 25) currently has a form of civilian oversight; Springfield (176) had one until, it seems, recently; and Providence, RI (134) has a police review agency. Cambridge, MA, and both Hartford and New Haven, CT, each have a form of civilian review as well, but are outside the top 200 cities.

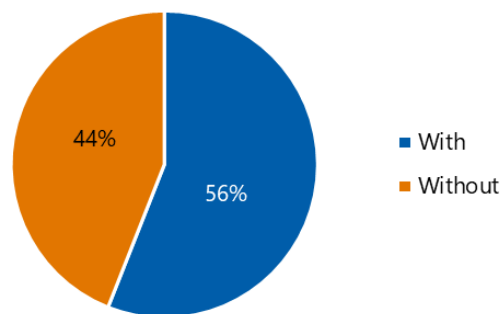
Figure 2 shows that 82 percent of the top 200 largest cities with civilian review boards establish them by charter or ordinance rather than through executive action. Oversight bodies created through executive orders or simple council resolutions tend to be the weakest, since they sit outside the formal legislative process and can be easily undone or deprived of resources. By contrast, **charters represent the strongest foundation,** because they define the very structure and powers of city government, embedding oversight within them gives boards a level of independence and authority that other routes rarely achieve, even if passing a charter amendment can be politically challenging. **Ordinances fall in between,** offering an important way to institutionalize oversight, but they are more susceptible to amendment or repeal. The research suggests that while both ordinances and charters provide stronger statutory grounding than executive action, **charter amendments remain the ideal path for building durable, independent oversight.**

NACOLE's report also provided an in-depth analysis of the charters and ordinances adopted in Tier 1 cities. Among the 100 largest cities, 76 have civilian review boards, and 63 of those were established through charter or ordinance. From this point on, the analysis centers on these 63 cities, providing insight into trends in appointing authority, the functions of the boards, and the common legal limitations placed on law enforcement representation.

Figure 3 shows that the appointment authority for members of civilian review boards was rarely afforded exclusively to either councils (5 cities, 7.8%) or mayors/city managers (4 cities, 6.2%). Instead, the majority of cities (32, or 50%) used a Combination of Authorities, most often the council and mayor together, sometimes with input from law enforcement leadership. Another 21 cities (33%) fell under the Other category, where appointments were made outside traditional political channels and often involved community groups, nonprofits, or religious organizations in the selection process. Only two cities (3.1%) lacked any clear provision for how appointments are made.

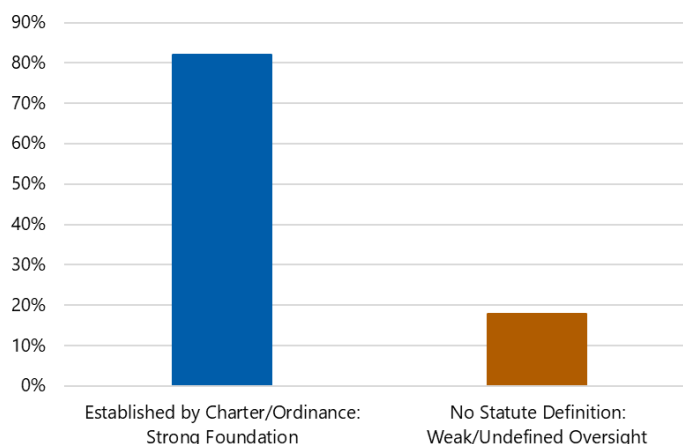
As for powers, civilian oversight entities are typically authorized to review completed investigations. Most also

Figure 1: Presence of Civilian Oversight in the Top 200 Most Populous U.S. Cities (Fall 2023)



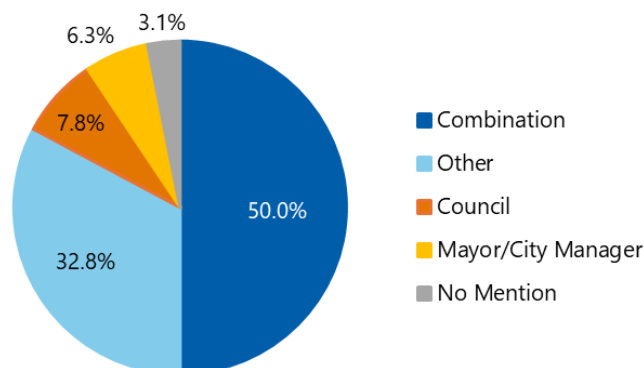
Source: [Impediments and Challenges to Civilian Oversight of Law Enforcement](#), University of Colorado Denver & NACOLE, July 19, 2024

Figure 2: Method of Establishing Civilian Oversight in the Top 200 Most Populous U.S. Cities



Source: [Impediments and Challenges to Civilian Oversight of Law Enforcement](#), University of Colorado Denver & NACOLE, July 19, 2024. Note: Figure 2 includes 112 cities with civilian review boards out of the top 200, 92 of which were established by charter or ordinance

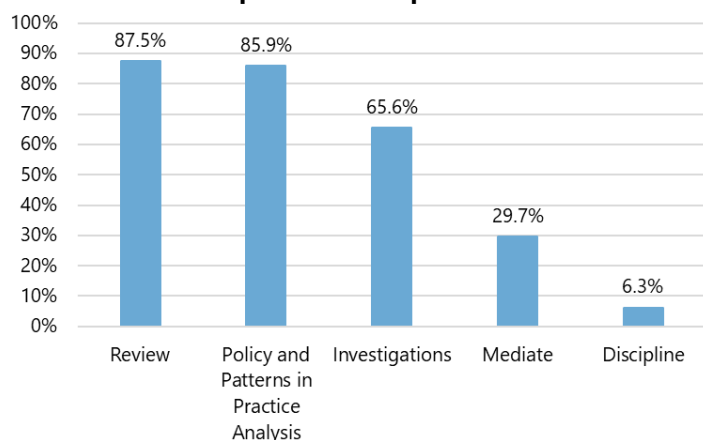
Figure 3: Appointing Authority for CRBs Established by Charter or Ordinance in the Top 100 Most Populous U.S. Cities



Source: [Impediments and Challenges to Civilian Oversight of Law Enforcement](#), University of Colorado Denver & NACOLE, July 19, 2024. Note: 63 cities included.

conduct policy and pattern-in-practice analysis, examining both the rules that govern policing and recurring trends in outcome data to assess how those rules are applied (Figure 4). **Nearly two-thirds of entities go further by conducting their own investigations**, while less than one-third provide mediation services, and an even smaller share play any role in deciding discipline. Although the number of agencies with disciplinary authority is limited, this represents a meaningful step toward power-sharing in police accountability, as it moves beyond simply making recommendations. Notably, most oversight agencies with disciplinary authority are police commissions—such as those in Detroit, Los Angeles, San Francisco, and Oakland—with St. Louis standing out as the only example where a civilian review board itself holds this authority.

Figure 4: Functions of CRBs Established by Charter or Ordinance in the Top 100 Most Populous U.S. Cities



Source: *Impediments and Challenges to Civilian Oversight of Law Enforcement*, University of Colorado Denver & NACOLE, July 19, 2024. Note: 63 cities included.

Figure 5 illustrates how charters and ordinances establishing civilian review boards define the balance between civilians and law enforcement in oversight roles. **The most common approach (45.3%, or 29 cities) is to require that these boards be comprised entirely of civilians.** Some cities (17.2%, or 11) permit a mix of civilians and active or retired law enforcement officers, but still mandate that civilians hold the majority. A smaller number (9.4%, or 6) allow officers and civilians to serve in nearly equal numbers, with some officers designated as non-voting members who provide information on policy, practices, and the law enforcement perspective.

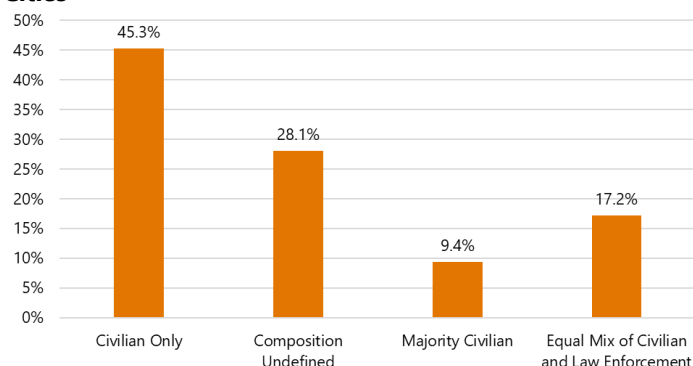
There is significant variation not only in whether law enforcement officers may serve on oversight boards, but also in the specific conditions under which such service is permitted. Some charters and ordinances are explicit in defining whether—and under what circumstances—current or former law enforcement personnel may hold oversight roles. In certain jurisdictions, eligibility requires a

waiting period following the conclusion of sworn service; others permit former, but not current, officers; and some impose restrictions based on jurisdiction, barring individuals who served in the same or neighboring agencies. In some cases, prohibitions extend broadly to all categories of former law enforcement. Additionally, several communities restrict participation by individuals with close ties to law enforcement, including immediate family members and police union representatives.

Because the U.S. has roughly 18,000 independently administered law enforcement agencies, there is no single national framework of oversight, and Congress has not passed comprehensive federal oversight legislation. As a result, most reform happens at the state and local level—where “home rule” authority, or the lack of it, often determines how much power a community can give its oversight body. **In states with weak or no home rule, legislatures have sometimes used preemption to narrow or strip local oversight powers, as seen in recent laws in Florida, Arizona, Tennessee, Utah, and Wisconsin.** These measures range from limiting oversight to policy review only, to imposing training or composition rules that tilt boards toward law enforcement perspectives, to eliminating investigative or disciplinary authority altogether.

These trends highlight that while common oversight functions—such as reviewing investigations, analyzing policy, or making recommendations—are essential, the real challenge in many jurisdictions is ensuring that the powers and responsibilities granted are both legally sustainable and sufficient to meet local needs. In short, NACOLE’s research shows that the structure of oversight cannot be separated from the political and legal environment in which it operates, and designing it requires navigating state-local power dynamics as much as deciding what the entity will actually do.

Figure 5: Board Composition of CRBs Established by Charter or Ordinance in the Top 100 Most Populous U.S. Cities



Source: *Impediments and Challenges to Civilian Oversight of Law Enforcement*, University of Colorado Denver & NACOLE, July 19, 2024. Note: 63 cities included.



SECTION 2: POLICE ACCOUNTABILITY IN WORCESTER: PAST LESSONS, PRESENT REALITIES

Now that this report has defined civilian oversight, examined NACOLE's effective principles, and reviewed many of the common practices found in these agencies, **it is time to turn to Worcester itself.** Police accountability in Worcester is shaped by a mix of local and state mechanisms, and decades of community debate over how those systems should work.

This section begins historically: **with a dive into the history of community conversations about civilian oversight,** tackling it from two angles. First, this section will trace these conversations about civilian review boards, in particular, going back to 1993. Then, this report will look specifically at the 1971 recreation of Worcester's Human Rights Commission partially as a response to calls from the community in the summer of 1970 for civilian oversight. While the scope and powers of the Human Rights Commission has changed over the years, it is an important part of the story of police oversight in Worcester. These two brief histories establish the local context and conversations about policer oversight.

The rest of the section follows **with a brief look at Worcester and Massachusetts' existing oversight landscape, and other potential and defunct systems of oversight within the City.** The Human Rights Commission, the Bureau of Professional Standards, the Executive Office of Diversity, Equity, and Inclusion's Investigations Division, and the state's Police Officer Standards and Training Commission each play a role, but their mandates, independence, and effectiveness vary widely. The City Manager's charter role as the "Chief Conservator of the Peace" is an oversight pathway, but one that has its own drawbacks discussed below. The Charter once had a "Citizens' Complaints Officer" appointed by the City Council, which may have had the power to investigate police complaints, but it was eliminated in the first municipal election under the 1985 Charter's purview. In other words, this section explores each facet of Worcester's existing oversight landscape—along with the history of community conversations about reform—to assess their roles, limitations, and the broader context in which they operate.

TRACING WORCESTER'S CIVILIAN OVERSIGHT DEBATES AND THE HRC'S LIMITED ROLE

Tensions between Worcester's police and its diverse communities—particularly immigrants and people of color—have long fueled demands for greater transparency and accountability. These calls, and broader movements around police reform and community justice, often arise in

the wake of critical junctures—moments when the use of excessive force or the death of unarmed people of color starkly exposes failures in public safety systems.

One such pivotal moment came in 1993, when 38-year-old Cristino Hernández, a Salvadoran immigrant facing a mental health crisis, died after being pepper-sprayed and forcibly restrained face-down by Worcester officers, leading to oxygen deprivation and fatal brain injury. Hernández's death galvanized public outrage and catalyzed calls for independent police review in the city, **with some in the Worcester community in 1993 and 1994 specifically urging the creation of a Civilian Review Board (CRB),** while others advocated for empowering the existing Human Rights Commission to investigate complaints against the Worcester Police Department (Hammel 1993; Wiley 1993; Wiley 1994).

In August 1994, the Worcester Regional Research Bureau (then, the Worcester Municipal Research Bureau) released a report on CRBs, "Civilian Review of the Police: The Case For and Against," ultimately arguing that:

"As an alternative to establishing a civilian review board, the Research Bureau suggests that the City of Worcester consider the use of an oversight mechanism that already exists. As noted earlier, the City Charter designates the City Manager as the chief conservator of the peace, which includes the power to review and investigate cases involving complaints against the police. In the Research Bureau's view, this authority may provide the independence, investigatory power, and oversight aimed at by civilian review" (Worcester Municipal Research Bureau 1994, 11).

Ultimately, the City of Worcester did not adopt civilian review in 1994. However, that did not end the calls for a CRB; **between 1994 and 2025 there have been several pushes for a civilian review board, though none have succeeded, and have often faced stiff opposition from City Council, the City Manager's Office, and the Worcester Police Department.** At times, there have been alternative calls to empower the Human Rights Commission to allow for it to undertake a similar function.

One of the earliest requests for a CRB after 1994 was in the fall of 1998 (and subsequently the spring of 1999), when Councilor-at-Large Stacey Luster introduced a request at City Council for then-City Manager Thomas R. Hoover to consider the creation of a CRB. At the time, Luster said, "the issue is not whether or not the police are fully investigating citizen complaints, it's whether our



citizens believe they are fully investigating their complaints” (Kotsopoulos 1999a). Soon after, Worcester’s Police Chief Edward Gardella voiced his own opposition to the idea, arguing in essence that “although surveys indicate 50 percent of Americans do not believe the police can investigate other police without bias, there are other studies that suggest police do a better job of investigating police than peer investigations of doctors and lawyers” (Kotsopoulos 1999b). **Ultimately, the City Council agreed with him that a CRB was unnecessary** (Kotsopoulos 1999c).

In September 1999, Worcester’s Human Rights Commission issued a report based on five listening sessions it had held in the spring, covering a wide-range of topics, including the police. The report summarized the testimony received, **including specifically that some citizens called for a form of civilian review, feeling that their complaints to WPD directly were ignored** (Worcester Human Rights Commission 1999, 5). The report issued several recommendations in response, including: the Commission should receive forwarded information about filed complaints and their results; “establishment of a neutral location, outside of the police department, for filing complaints of police misconduct”; and “establishment of a process whereby complaints against police officers be filed initially with the Human Rights Commission and then forwarded to ... Internal Affairs” (6-7). Still, despite this, the Human Rights Commission did not, at the time, subsequently support or oppose a CRB, despite the fact that some members of the public desired one at the listening sessions (Kotsopoulos 1999d). By March 2000, city administration agreed to allow the police to forward quarterly collections of complaints to the Human Rights Commission and that it would support the Commission’s recommendation against a CRB; at the time, the Telegram pointed out that the Commission actually “did not recommend for or against creating one” (Hammel 2000). Indeed, the City’s response refers back to Councilor Luster’s request for information regarding a CRB; **the City Manager’s Office said that “efforts were made to review various models” but that ultimately it decided against adopting such a system** (Office of the City Manager 2000).

In the years following, there had been some talk of civilian review in the city, including in 2008 after some serious concerns about internal police investigations arose following the release of hundreds of pages of documents obtained by the Telegram & Gazette (Caywood 2008). The coverage centered on one officer’s internal affairs file, which spanned over 1,100 pages and exposed a troubling pattern of superficial investigations and unaddressed misconduct. The documents pointed to

an institutional bias in favor of officers and raised broader concerns about the Worcester Police Department’s ability to conduct fair and impartial reviews. Officers were permitted by supervisors to respond to civilian complaints in writing, while complainants faced lengthy in-person questioning. Investigators failed to pursue witnesses, neglected to reconcile conflicting accounts, and closed cases when complainants became unresponsive—despite best practices calling for thorough follow-up in all cases. **The findings of this reporting reflect nearly identical breakdowns in the internal investigation process and lack of disciplinary follow-through as those identified in the DOJ’s December 2024 pattern and practice investigation into the department.** In December 2008, Ronal C. Madnick, director of the Worcester County chapter of the American Civil Liberties Union (ACLU), submitted a petition to the Worcester City Council calling for the creation of a civilian review board (CRB) to investigate police misconduct. His call came in response to concerns about the integrity of internal investigations conducted by the Worcester Police Department.

In 2015, Councilor-at-Large Konstantina Lukes renewed calls for a CRB at City Council, putting in a request for then-City Manager Edward Augustus’s administration to produce a report on the “applicability of a budget, staff, subpoena powers and investigatory powers of such a review board” and “whether the board could provide citizen input to the city manager on police programs, policies, and procedures” (Kotsopoulos 2015a). **The City Council, however, voted 10-1 to file the order, with some on the Council arguing that they wanted to see how “initiatives and conversations” that were ongoing in the community would “first play out before contemplating the need for a civilian review board”** and that “the city already has a system in place when dealing with police complaints, with the Human Rights Commission, the Coalition on Bias and Hate, and the City Council Public Safety Committee playing key roles as part of that process” (Kotsopoulos 2015b).

In 2021, a group of 18 local organizations called for a CRB with subpoena powers after City Manager Edward Augustus issued a report with recommendations to reform the Worcester Police Department, that did not include a specific CRB component; the Worcester Board of Health, in May 2021, also voted unanimously to support these organizations and their call for a CRB (Foskett Jr. 2021a; Petrishen 2021a; Petrishen 2021b). These recommendations from the City Manager included removing “resource officers from schools,” implementing “some form of alternative deployment that sends mental health and social workers on calls with police,” and establishing “a new investigations division at City Hall that

would address both employee and resident complaints” (Foskett Jr. 2021a). **Ultimately, according to Telegram & Gazette reporting at the time, the City Manager preferred to “see through established efforts at the city and state level that are already underway,”** arguing in a statement that “We are in the process of implementing 17 recommendations and action items resulting from input from the City Council and members of the community” and that he was “of the opinion that we should focus on bringing all these efforts into fruition” (Foskett Jr. 2021b).

In 2024, the City of Worcester released the racial equity audit of the Worcester Police Department conducted by independent non-profit CNA. Among its findings, CNA recommended that the Worcester Police Department and the City of Worcester should engage in conversations about the establishment of a civilian oversight body. The stated reason for this was that both members of WPD and the public at large expressed concern that discipline was unequal throughout the department, contending that “favoritism and personal connections with higher-ranking personnel may affect the determination of consequences” (Richardson et al. 2024, 68). CNA’s analysis concluded that it was “essential for the department to recognize and address any negative impact of bias or even its perception” (68) – the perception being that the police cannot objectively investigate themselves, a belief that came up again and again throughout reporting on civilian review boards in Worcester. Indeed, even CNA theorized that a decrease in complaints received between 2017 and 2021 could have been because either “community members have fewer issues to report or that they are choosing not to report complaints because they lack confidence in the complaint investigation and resolution process” (39). Ultimately, the only way to know why there were fewer complaints during that time period would be to conduct surveys. Still, in regards to a civilian oversight entity, CNA argued that such a body would “enhance the fairness and credibility of the complaint-resolution process, introduce another layer of objectivity, and provide valuable external perspectives in formulating disciplinary actions and policies that promote equity” (69).

Soon after the Department of Justice released its report on WPD in December 2024, discussions of a CRB – or, at least, a report on one – were renewed, including the City Manager asking the Research Bureau to prepare a report on them (Petrishen 2024b; Caushi 2025a; Caushi 2025b; Bass 2025).

THE HUMAN RIGHTS COMMISSION AND THE POLICE

While Worcester’s Human Rights Commission (HRC) has occasionally been called upon to examine police conduct,

it has never functioned as a dedicated or empowered civilian oversight body. **Over the decades, residents and advocacy groups have repeatedly called for stronger oversight mechanisms**—at times suggesting the HRC be restructured to fill that role, or replaced altogether. This section traces the history of those efforts and the persistent limitations—legal, political, and structural—that have kept the HRC from serving as an effective check on police misconduct.

In February 1971, Worcester’s City Council adopted an ordinance creating the City’s Human Rights Commission. The idea of a human rights board was not “new” in Worcester at the time; rather, it replaced a Human Rights Committee formed by the City Council in March 1968 that disbanded in September 1970. That committee had the purpose of advising and assisting “the city manager in all areas of community relations” and it had “no investigatory powers or authority to enforce laws” (Mansbach 1970b, 13). At the time of its creation, one city councilor “predicted that the committee would be like a ‘toothless tiger’ and have no more recognition than any other city agency” (1970b, 14). **Indeed, the disbanding of the Human Rights Committee, and the subsequent push for a new Human Rights Commission, followed nearly two months of accusations that the Committee was useless.**

In 1970, an off-duty police officer allegedly told the co-owner of a restaurant on Main Street called “The Rib Crib” that she had to close at 2 AM on Saturday, August 1 or she would lose her common victualer’s license; the off-duty officer did this without any authority and was later suspended for five days (“Police Officer” 1970; “Officer Suspended” 1970). After the incident, the co-owner made complaints that for several days “heavy concentrations of police near her restaurant are cutting business and constitute harassment”; a deputy police chief denied the claims that the police were targeting the Rib Crib, and, that, rather “restless youths” in the area necessitated a police response those nights (O’Connor 1970, 17A-18A).

Following the incident, a local organization called “The Black Coalition” presented City Manager Francis McGrath with a list of ten requests, which included “an end to police harassment and brutality” and **“a citizens’ committee to review complaints against police”** (Mansbach 1970a). In addition, members of the Coalition requested that the City Manager disband the Human Rights Committee “because the coalition feels it is powerless to act against discrimination” and that they felt the Committee was used “as a crutch by City Hall for not doing anything” (Talbot 1970, 14). Ultimately, the City Manager’s response was to stand with the Human Rights

Committee, arguing that its role was “similar to the United States Civil Rights Commission, which is also primarily advisory in nature. The committee realizes it has no authority under the law to prosecute acts of discrimination of any type, but it has provided an open forum for such complaints” (1970, 14). **Similarly, the City Manager rejected the idea of a civilian review board, arguing that it was the City Law Department’s opinion that he could not delegate the authorities proposed to such a board** (1970, 14).

On September 21, 1970, all of the members of the Human Rights Committee resigned; the City Manager then announced he would appoint an interim committee to create a new structure for the HRC. The members of the original committee argued that the Black Coalition’s demand for their resignation “served as a catalyst, not a spur, to their resignation” (Mansbach 1970a, 13). The City Council passed a draft ordinance on December 1, 1970, to establish a Human Rights Commission, after the Interim Human Rights Committee returned with a structure for one, including a subpoena power for the Commission (Kindleberger 1970, 21). On February 3, 1971, the final Human Rights Commission ordinance passed a City Council vote, 8-1. **The five-member commission would have subpoena powers** (although there was question whether the City Council could provide such authority, a subsequent court case that became *Bloom vs. City of Worcester*, 363 Mass. 136, found that it was permissible); and, additionally, there was a 15-member human rights advisory committee as well (Mansbach 1971). The final ordinance included four amendments related the Commissions’ relation to the Police, including a guarantee of the rights of those under investigation.

Although the size and scope of the commission has changed over the years, its mission has remained largely the same. In 1971 that mission included the ability: “to see that each individual regardless of his race, color, religious creed, national origin, sex, age or ancestry, shall have equal opportunity in or access to employment, housing, education, recreation, and public accommodations; to assure that each individual shall have equal access to and benefit from all public services; to protect each individual in the enjoyment of his civil rights” and more (*Bloom vs. City of Worcester*, 363 Mass. 136, 138). In 2024, as of Worcester’s Revised Ordinances of 2015, that mission includes the ability to conduct investigations on complaints regarding: “the denial of equal access to and discrimination in employment, housing, education, recreation and public accommodation ... where such denial or discrimination against a person is based on race, color, religious creed, national origin, gender, age, ancestry, marital status, parental status, sexual orientation,

disability, or source of income; the denial to any person of equal access to and benefit from all public services; the violation of the enjoyment and exercise by any person of his or her civil rights” and, again, more (*Worcester City Council* 2024, 126). Indeed, the Human Rights Commission has an extensive list of duties and responsibilities that includes the abilities to: “conduct investigations; hold hearings; conduct mediation; issue orders and reports; review departmental policies; review departmental disciplinary actions; issue publications; develop training programs; create committees; make recommendations and annual reports; [and] make rules and regulations” (126 -128). With the advice and assistance of the City Solicitor, it can subpoena witnesses, though it currently does not have the power to subpoena witnesses itself (126). The 15-member advisory committee formed in the original 1971 ordinance was also disbanded long ago.

Worcester’s Human Rights Commission serves as an “executive board” under the jurisdiction of the City Manager under Worcester’s Charter. It is currently “housed” within the Executive Office of Diversity, Equity, and Inclusion, which has existed since 2020. According to Worcester’s Home Rule Charter, executive boards “set policy for a city department/and or act in the nature of city departments” (*City of Worcester* 2022, 15). Members are appointed directly by the City Manager (15).

Since at least the 1980s, Worcester’s Human Rights Commission has at times attempted to investigate complaints about the police itself, or it (or others) have sought an expansion of its powers in order for it do so. For example, in the late 1980s, a group of community organizations came together as the “Coalition for a Better Human Rights Ordinance” to push for change in the ordinance – and they did, among other things expanding the commission from five to nine members and adding language to its mission to include protection against discrimination for other groups, including gender, parental status, marital status, sexual orientation, and sources of income (Collier 1991).³ **At the time, other organizations called for a Human Rights Commission with more power to investigate complaints against the police, some going so far as to call for a Commission with the powers of a typical civilian review board, though some later came to believe that the Human Rights Commission was not the place to pursue those powers** (Williamson 1992; Wiley 1993; Hammel 1993; Kush 1999b; Kotsopoulos 1999c; Nangle 1999). At a 1999 forum, two men present at the creation of the commission, Massachusetts Appeals Court Associate Justice Mel L. Greenberg and lawyer Burton Chandler, recounted to an audience “how the commission was formed to combat abuses of police authority in the 1960s, during the height

of the civil rights and anti-war movements” (Monahan 1999). In their view, the early Commission had some success at doing so, though in the years since it had seen some of its powers, including its staff, stripped away (1999). Justice Greenberg furthered that argument in a 2020 editorial about the origins of the Human Rights Commission, while acknowledging that over the years it had lost many of its initial powers (Greenberg 2020).

At times, opposition to a civilian review board was supported with the assertion that citizens dissatisfied with complaint disposition by the police could take their cases to the human rights commission (Kush 1999a; Kotsopoulos 2015b; Petrishen 2024a). And, of course, in the past thirty years the Human Rights Commission has examined complaints about the police – see for example (Worcester Human Rights Commission 1999), the report on listening sessions conducted in 1999 mentioned above in the history of CRBs in Worcester section, and also other examples of investigations, such as (Kotsopoulos 1995; Monahan 1998). Or for examples of WPD bringing complaint data to the Human Rights Commission see (Hammel 2000; Kotsopoulos 2018; Kotsopoulos 2019). And, at times, the Human Rights Commission has clashed with the City Manager over the exercise of its functions (such as Kotsopoulos 1995).

Tensions over the Human Rights Commission’s purpose and role with regard to the police remain. For example, in 2023, the City Manager’s office explicitly directed the Commission to pause its inquiry into policing, issuing a memo that redirected the body’s focus toward other “city priorities” and away from its own initiated investigations into law enforcement practices (Marino 2025; Turken 2025). As reasoning, the City Manager noted the limited time of the HRC (and its one monthly meeting), the then in-progress racial equity audit and Department of Justice investigations, and other DEI initiatives that needed attention while those other investigations were ongoing (Petrishen 2023; Petrishen 2023a). Currently, the Human Rights Commission meets with the WPD Chief of Police and other leadership on an annual basis. At these meetings, WPD leadership answers questions and provides data regarding use of force, officer training, officer incidents, and other relevant statistics for the HRC’s work—including secondary review of proposed police policies. At the most recent of these meetings, on June 23, 2025, the Chief and his leadership team answered a wide-ranging series of questions about the Bureau of Professional Standards, use of force, the DOJ report, data standards, and more. Video of that meeting [can be found here](#) and minutes [can be found here](#).

From 1970 onward, Worcester has long missed a clearly articulated vision for why or how the HRC’s work on police

oversight was sometimes incompatible with city priorities—especially when well-documented problems persist within the Worcester Police Department, while no comparable concerns have been raised about other city agencies under the Commission’s purview. In this light, the HRC’s history offers more than an account of institutional limitations; it serves as a case study in how efforts toward reform can be redirected, delayed, or quietly constrained—not through outright rejection, but through a managed process that maintains the appearance of responsiveness while ultimately preserving the status quo.

Whether the issue is hesitancy about expanding the Human Rights Commission’s powers within its current structure, or concern that pushing too hard on police accountability could provoke political conflict, remains unclear. What the history does show is a consistent pattern: **efforts to strengthen oversight have been reactive, constrained, and often scaled back when they approached real scrutiny of law enforcement.** As a result, the HRC has often served as a venue for raising concerns, but not as a mechanism for ensuring change. While the HRC does receive reports from the police, it is not empowered to investigate or audit the data; it lacks staff trained in investigative methods like the EODEI’s investigative division (discussed subsequently); and receiving reports annually puts it more firmly into reactive rather than proactive oversight. If Worcester is serious about building community trust and restoring confidence in its institutions, that dynamic must shift. **A civilian review board with not just the ability to elevate concerns, but also a clear and effective role in making outcomes and decisions, will be essential to that process.**

WORCESTER POLICE DEPARTMENT’S BUREAU OF PROFESSIONAL STANDARDS: THE CHALLENGES AND LIMITS OF INTERNAL ACCOUNTABILITY

According to the Worcester Police Department, the Bureau of Professional Standards (BOPS) is responsible for receiving and investigating complaints submitted online, by phone, mail, or in person, and “no case is dismissed.” Its role is to safeguard the integrity of the department by investigating allegations of misconduct, whether raised by community members or within the department. These can include serious complaints such as corruption, unlawful arrest, harassment, and excessive use of force. Each complaint is logged, reviewed, and assigned for investigation through a triage process that directs cases to the appropriate path. Allegations disproven by clear evidence may be resolved as “exceptionally cleared,” while those involving potential criminal conduct are referred to the relevant investigative unit, with BOPS continuing its administrative review. In serious cases, officers may be placed on administrative leave during the investigation.



WPD describes BOPS as following a structured, multi-step process designed to ensure neutrality and completeness. Complaints are entered into the internal case management system, and the POST Commission is notified when required. Investigators collect evidence, review body-worn camera footage, conduct recorded interviews, and may consult subject matter experts in areas such as use of force or constitutional law. Once complete, investigators submit a fact-finding report that undergoes three levels of review: by a Captain, Deputy Chief, and the Chief of Police, who determines final findings and discipline. WPD emphasizes that BOPS serves as a fact-finding, not disciplinary, body and that it tracks all use of force incidents as part of an early warning system intended to identify behavioral patterns and intervene proactively.

However, serious allegations have been raised about BOPS' investigative quality and the department's history of disciplinary follow-through.

The [U.S. Department of Justice's 2024 Findings Report](#) claimed that WPD's accountability system required significant reform to ensure investigations are impartial, thorough, and capable of producing fair and proportional discipline. The DOJ concluded that "WPD does not appropriately respond to misconduct complaints and rarely holds officers accountable." The federal review found that investigators sometimes failed to interview key witnesses, discounted complainants' accounts without corroboration, and reached conclusions unsupported by the evidence.

In some cases, serious complaints—such as uses of force—were investigated by an officer's direct supervisor rather than by BOPS, a practice the DOJ described as "less likely to avoid the appearance of impropriety." One example involved a supervisor clearing an officer of wrongdoing without even interviewing him, despite fourteen prior excessive-force complaints that had never been sustained. Even when BOPS conducted the investigations itself, the DOJ found troubling inconsistencies. In one 2020 case, a restrained man in crisis was struck in the face for spitting; though head strikes are recognized as a serious use of force, the incident was deemed "reasonable and appropriate" by BOPS and approved by command staff and the former Chief of Police.

After reviewing dozens of BOPS use-of-force investigations conducted between 2018 and 2022, the DOJ found that only five complaints were sustained—and none involved the use of force itself. In those cases, the sustained findings were limited to reporting violations, such as failing to document incidents properly, with discipline often confined to counseling or brief suspensions.

This is not the first time BOPS has faced criticism for inadequate investigations. Concerns about incomplete fact-finding, minimal scrutiny of officer conduct, and weak disciplinary follow through date back at least to the Telegram & Gazette's 2008 investigative series referenced earlier in this report.

WPD complaint data from 2023 through 2025, shown in [**Figure 6**](#) below, reveal the following: in 2023, 45.8 percent of complaints were sustained, 22.9 percent were not sustained, and 29.2 percent were exonerated. In 2024, 69.7 percent of complaints were sustained, 10.1 percent were not sustained, and 14.6 percent were exonerated, with a small share classified as resolved or unfounded. The total number of complaints increased from 48 in 2023 to 89 in 2024.

It is important to separate complaints by type, particularly those involving serious allegations such as excessive force, to understand what kinds of conduct are being addressed and how accountability is being applied. Parsing this data, reviewing complaint files, and initiating independent investigations where appropriate are responsibilities that a civilian review board could undertake to supplement the department's work. **The issue is not simply the rate of sustained or not sustained complaints, but the quality and fairness of the investigative process itself. Building on the DOJ's findings, which raised concerns about the consistency and thoroughness of internal investigations, it is essential that the process behind these outcomes be transparent and subject to verification.** A civilian review board could provide this additional layer of examination and verification, helping to ensure that internal data are accurate, that serious cases receive appropriate scrutiny, and that the investigative process is carried out with fairness and integrity.

The Worcester Police Department's response to the DOJ's

Figure 6: Worcester Police Department Analysis of Civilian Complaints

Year	Sustained	Not Sustained	Exonerated	Unfounded	Resolved	Exceptionally Cleared	Total Cases
2023	45.8%	22.9%	29.2%	2.1%	-	-	48
2024	69.7%	10.1%	14.6%	3.4%	2.2%	-	89
2025 (to date)	39.7%	19.2%	34.2%	2.7%	2.7%	1.4%	73

Source: Worcester Police Department



2024 findings has been mixed, reflecting at times a selective acknowledgment of the report's conclusions. For example, during a City Council hearing, Chief Saucier did not address the DOJ's broader determinations regarding patterns of excessive force, sexual contact between officers and women in the commercial sex trade, or systemic issues with complaint handling and supervisory oversight. Instead, he emphasized a limited set of points where the department concurred with the DOJ's observations.

He agreed that "cop checking"—a practice once used in prostitution stings where sexual physical contact was made to confirm whether someone was an undercover officer—"should not be allowed" and noted that it has since been banned. A new policy now prohibits officers from allowing or engaging in any physical contact of this kind during undercover operations. He also acknowledged that K-9 units can be dangerous, and new guidelines prohibit their deployment at mass gatherings, riot scenes, and other high-risk crowd-control situations. He further expressed support for improving data collection, highlighting the department's plan to implement a new data management system. According to WPD, this includes transitioning to the Hexagon RMS platform to enhance tracking of behavioral-health calls and Crisis Intervention Team responses, developing a public-facing traffic-stop data dashboard, and introducing a new use-of-force reporting form compatible with both Hexagon and the BOPS PowerDMS system to standardize documentation and supervisory review.

The City and WPD have made other changes while the DOJ report was being developed and since its release. The department launched a body-worn camera program, adopted a formal sexual-assault investigation policy, reassigned excessive-force investigations to the Bureau of Professional Standards (BOPS), expanded the co-responder program pairing officers with mental-health clinicians, and began replacing its records management system. A new Use of Force Committee within the Training Division now reviews Level 4 and higher incidents to identify training needs, while supervisors are required to submit written analyses for all use-of-force incidents, including review of body-worn camera footage and scene documentation when injuries occur. Training requirements have expanded to include 40 additional hours of Crisis Intervention Team (CIT) instruction for new recruits, new trauma-informed and victim-centered investigation modules for in-service officers, and enhanced duty-to-intervene instruction led by a former FBI Civil Rights Unit Chief. The co-response program has been extended to provide 64 hours of coverage per week, and officer selection for specialized units is now based on referrals, résumés, complaint history, and attendance.

The department has also introduced new measures related to oversight and accountability. Random body-worn camera audits have increased from 20 to 30 per month. Within BOPS, all use-of-force complaints are now investigated solely by that bureau, command-level investigations have been discontinued, and anonymous complaint filing is available online and in person. Funding for a new internal-affairs software system to disaggregate BOPS data is included in the FY2026 budget. WPD also launched a Community Policing and DEI curriculum in collaboration with the Executive Office of Diversity, Equity, and Inclusion, approved by the MPTC and implemented in the January 2025 Academy. The department has formally applied to the Massachusetts Police Accreditation Program to pursue both Certification and Accreditation status, aligning its operations with statewide professional and accountability standards.

The department also argues that effective oversight is reflected in recent data, showing a high rate of sustained complaints.

Despite these reforms, there remains no fully independent mechanism to determine whether the Worcester Police Department's internal accountability systems are functioning as described. An external civilian oversight entity could evaluate whether policy changes are being carried out effectively, whether BOPS investigations are thorough, unbiased, and evidence-based, and whether disciplinary decisions are consistent and proportionate. An oversight entity could, for example, review all types of complaints—not only those related to discrimination, as currently handled in part by the Executive Office of Diversity, Equity, and Inclusion—but also allegations of excessive force, misconduct, and procedural violations. It could examine case files, body-worn camera footage, and investigator interviews, audit the quality of investigations and disciplinary outcomes, or even conduct its own investigations similar to the EODEI's investigative arm. **A civilian oversight entity could complement the reforms the City and WPD have undertaken by providing independent verification that internal processes are being implemented effectively and consistently, rather than existing primarily on paper.** Public confidence in internal accountability depends on external confirmation that reforms are being implemented with integrity, transparency, and consistency.

THE LIMITS OF THE POST COMMISSION

The Massachusetts Peace Officer Standards and Training (POST) Commission was created through the state's 2020 police reform law in response to national calls for systemic accountability in law enforcement (Mass. Gen. Laws ch. 6E). **It serves as the Commonwealth's first centralized regulatory body overseeing police officer certification,**



professional standards, and discipline. The primary function of the POST Commission is to ensure that all law enforcement officers in Massachusetts meet baseline requirements for training, conduct, and ethics. It has the legal authority to certify and decertify officers, investigate allegations of serious misconduct such as excessive force or biased policing, and enforce minimum standards for how police departments operate. **Officers found to have violated state law or professional conduct standards can have their certification suspended or revoked, barring them from serving in any law enforcement role across the state.** POST also certifies police departments and requires that they maintain certain policy standards to remain in good standing. In addition to enforcement, POST publishes a public database of certified, suspended, and decertified officers to promote transparency.

Although the POST Commission plays a key role in raising the baseline for police accountability statewide, **it was never designed to replace local oversight.** It does not regularly audit how departments handle complaints or investigate their own officers, nor does it assess whether misconduct cases are investigated thoroughly or dismissed prematurely, nor can it consider or investigate complaints of rudeness or discourtesy that individuals might experience. **POST generally becomes involved only when serious violations are substantiated or formally referred to the state.** For example, POST records show that in 2025, 25 officers were disciplined for fast-forwarding through a mandatory training video—a “non-minor police violation.” While all remained certified, each lost time off as a penalty. Such information is useful, but POST data does not reveal the full scope of complaints received by WPD, the nature of those complaints, or why many were not sustained.

This is why POST cannot substitute for local civilian oversight. In Worcester, the DOJ found systemic failures in investigative quality, accountability, and a persistent reluctance to sustain complaints or discipline officers. A local oversight body empowered to review or conduct investigations could provide the public with greater transparency, assessing which complaints are handled fairly and thoroughly while flagging concerns before they are dismissed or quietly closed. Such a body could also identify broader patterns in use of force, community complaints, or enforcement practices that may not amount to individual violations but reveal deeper cultural or procedural problems. **In this way, local oversight would complement POST by ensuring that cases elevated to the state are built on reviews that residents view as credible, complete, and unbiased.**

THE INVESTIGATIONS DIVISION OF THE EXECUTIVE OFFICE OF DIVERSITY, EQUITY, AND INCLUSION

Other investigatory outlets in Worcester, with a smaller circle of jurisdiction, includes the Executive Office of Diversity, Equity, and Inclusion’s (EODEI) “Investigations Division.” While this division is limited to investigating only issues of discrimination and bias, rather than direct misconduct and corruption, it can, under limited circumstances, investigate some issues that may be related to the police. The lead investigator here has:

- ▶ “the power and duty to initiate investigations of discriminatory practices”
- ▶ the ability to “investigate human/civil rights complaints filed against a city employee by a city employee or a member of the public”
- ▶ the ability to “investigate human/civil rights complaints filed against an employee of the police department by a member of the public” (Worcester City Council 2024, 123).

The Investigations Division has open access to city records, and works with BOPS to receive records that are within WPD systems, such as body camera footage. Complaints against the police that fall under EODEI jurisdiction are investigated to completion within 90 days. Residents and city employees can make complaints to the division in-person, through calls to the EODEI office or the Investigation Division’s hotline, or through an online intake form. If the Division determines that the complaint falls within its jurisdiction, it will undertake the investigation; and if not, it will forward that complaint to BOPS, or if it is a criminal allegation, the Detective Bureau. If a complaint to BOPS involves a discrimination claim, it is forwarded to the Investigations Division. If the Investigations Division finds that a WPD employee violated the City’s anti-discrimination policies, the Chief Equity Officer can recommend remedial action to the Police Chief.

The Investigations Division is also responsible for undertaking investigations on behalf of the Human Rights Commission, who’s powers, as already established, include investigating “the violation of the enjoyment and exercise by any person of his or her civil rights” and “the denial to any person of equal access to and benefit from all public services” (2024, 126).

The EODEI itself has a wide-ranging agenda focused on citywide leadership development, workforce equity, disability inclusion, and employee engagement. Major initiatives include the expansion of the Manager’s Academy, enhanced collection of Equal Employment Opportunity (EEO) data to improve recruitment equity, and the implementation of a streamlined ADA accommodation

process. The department also plays a central role in developing inclusive workplace culture through cultural programming and DEI trainings across departments, including the Police and Fire Departments. In addition, the office launched a public hotline as a secondary reporting channel to receive complaints of discrimination, harassment, and bias—both from within city departments and from community members, including allegations involving the Worcester Police Department where bias is a factor. Other recent accountability measures the EODEI has undertaken include anti-harassment and compliance training for WPD, a [racial equity dashboard](#) detailing the many wide ranging changes that WPD has undertaken following CNA's racial equity audit, the use of the Chief Equity Officer for assessing feedback on WPD's promotional process, the removal of the Chief and Deputy Chief from civil service requirements, policy review initiatives of WPD, and work with WPD on accessibility issues for city residents.

Despite the breadth of EODEI's responsibilities—spanning everything from leadership training and employee development to oversight of disability policy and organizational culture—**its jurisdiction is generally limited to cases involving discrimination or bias.** This presents a challenge: throughout the investigative process, whether the complainant is aware of it, discriminatory treatment or bias may have influenced outcomes in subtle or unreported ways, further narrowing the window in which the DEI office can formally intervene. In other words, a more effective and focused approach towards review of the police would be to centralize investigations or reviews of all types of complaints involving the police in an external, independent body. This would allow EODEI to continue supporting systemic equity initiatives across city government while ensuring that police oversight receives the dedicated capacity, consistency, and independence it requires. This is not to diminish the many policy changes that have occurred under the current City Manager, Chief of Police, and Chief Equity Officer following the racial equity audit and DOJ investigation—it is simply noting the limited jurisdiction of the Investigations Division and the split in where investigations take place.

DIFFICULT OR DEFUNCT ALTERNATIVES TO A CIVILIAN REVIEW BOARD IN WORCESTER

Relying only on the City Manager's official capacity as "Chief Conservator of the Peace" to investigate the police, as suggested by the Research Bureau in 1994, requires significant administrative capacity. Given the office's broad responsibilities, some complaints may go unaddressed—not out of neglect, but due to limited time and resources. This is the "difficult" alternative mentioned in the above title—difficult not because it could not be implemented,

but difficult given the scope of responsibilities that the City Manager already faces and the oversight that would need to be established. That is, in other words, the City Manager would be unable to personally authorize every investigation or look into every complaint about the police, given what is discussed below. However, an oversight office, perhaps along the auditor or inspector general models, could fit within the overall hierarchy of the City Manager's office, and could fit within the "Chief Conservator of the Peace" responsibilities.

Complaints about the police fall within a wide spectrum. When we think about civilian review of the police, we often think that such an entity would be handling complaints about use of force, harassment, and criminal conduct. And while it would assuredly have such complaints, **some research has shown that complaints about police also frequently includes such categories as verbal discourtesy or rudeness, in addition to improper use of force** (Terrill and Ingram 2016, 153). One very small study, in Victoria, Australia, found that reasons for complaints ranged from "abuse of authority" (23.5%), to rudeness (21.7%), "duty failure, [i.e.] a lack of service" (21.1%), and violence or assault (10.8%), among other reasons (Prenzler 2010, 6-7). Putting the duties of investigation or review of complaints against the police into one already-existing agency or office may constrain what actually gets investigated or addressed—again, not out of neglect, but because of a strain on already limited time and resources.

As for defunct alternatives, Worcester once had another mechanism for processing complaints: the Citizen Complaints Officer, a position akin to the City Clerk and City Auditor because it was independently appointed by the City Council. The position was eliminated from the Charter by vote on November 3, 1987. Its powers, outlined in Section 2-8(c), stated that the officer "shall be responsible for processing citizen complaints and inquiries that are directed or referred to him/her." If questions arose about jurisdiction over the police department, the section added that the officer would "investigate and analyze data on all citizen complaints received" and "confer with and receive the cooperation of the city manager and the department heads and executive officers of the city agencies." While the position's elimination makes this a moot point, it demonstrates that Worcester once had a form of complaint review independent of the City Manager and may provide a model for future oversight.



SECTION 3: MODELS OF ACCOUNTABILITY AND OVERSIGHT IN PRACTICE

So far, this report has covered the types of civilian review along with NACOLE’s effective principles, and has done an in-depth examination of various calls for civilian review in Worcester. What has become clear over the course of this work is that the desire for civilian oversight in the City is *not new*. It has been called for repeatedly since at least the 1970s, and maybe even prior that, whenever there has been a high profile event involving the police. And while Worcester has some investigatory outlets that serve similar functions, their limits and shortcomings are clear. **For these reasons, the Research Bureau recommends the creation of a civilian oversight agency of some form within the city.**

The following section highlights important principles and practices that the Research Bureau believes a civilian review board designed in and for Worcester should uphold where possible. These should be the guiding practices that inform the creation and operation of such a board, insofar as municipal and state law will allow. Within each of the practices below, the Research Bureau has also included examples from other review agencies across the country. It should be noted that this section does not provide an exhaustive list of best practices, but those that the Bureau believes are among the most important for policymakers in the City to consider as they work towards creating such an oversight agency.

Overall, this section presents an opportunity to use “best practices” and models to create an effective system of oversight for Worcester.

1) **Clear Jurisdictional Authority and Discretion**

Oversight must manage caseloads responsibly, focusing resources where they matter most. **New York City’s Civilian Complaint Review Board (CCRB)** runs a mediation program and can dismiss matters outside jurisdiction, without merit, or better suited for other venues, while moving forward on serious complaints. **Oakland’s Community Police Review Agency (CPRA)** is required to investigate high-priority cases (use of force, deaths in custody, profiling) but can decline or refer other matters, balancing mandate with capacity. **Boston’s Civilian Review Board (CRB)** adds flexibility by allowing cases to be initiated by board vote even without a complainant, but it too can close or refer cases back when appropriate. These examples show that Worcester’s system should explicitly authorize its board to dismiss trivial or misfiled complaints while guaranteeing full review of the most serious ones.

2) **Scope and Execution of Investigations**

The creation of the civilian review board will not eliminate the Bureau of Professional Standards or investigations done by the Worcester Police Department. It’s necessary, then, for the creation of the oversight agency to delineate the primary scope and execution of its investigations. For example, who has the primary authority to investigate complaints, and which kinds? In **Cambridge**, for example, if a complainant brings concerns to the police first, the police will investigate, and the board can review; and if complaints are brought to the **Police Review and Advisory Board (PRAB)** first, the board investigates. In both cases, one organization must inform the other. In some cities, investigations are done concurrently by the

Figure 7: Expectations for a Strong and Sustainable Civilian Review Board in Worcester

What are the powers?	1. Clear Jurisdictional Authority and Discretion
	2. Scope and Execution of Investigations
	3. Independent Investigative Capacity
	4. A Sufficient and Sustained Budget
	5. Subpoena Power
Who is involved?	6. Selection and Appointment of Board Members
	7. Limits on Police Representation in Oversight Roles
	8. Representative and Inclusive Membership
	9. Member Training Requirements
How is the work implemented?	10. Access to Police Data Systems
	11. Transparency in Investigation Results
	12. Regular and Public Reporting
	13. Opportunities for Community Listening and Engagement
	14. Handling of Disciplinary Recommendations



police and the agency; in **Hartford**, for instance, the inspector general conducts concurrent investigations with the police when directed by the review board. Should one investigation take precedence or pause for the other? Answering these questions from the start can eliminate potential conflict in the future when jurisdictions are questioned.

3) Independent Investigative Capacity

An oversight body without its own investigators is limited to second-guessing internal affairs. The most effective models empower dedicated, professionally trained civilian staff. **Oakland's Community Police Review Agency (CPRA)** is required to maintain at least one investigator per 100 sworn officers and employ a licensed attorney-investigator as well as an independent agency attorney separate from City legal staff. Investigations are subject to deadlines and backed by authority to compel records. **Cleveland's Office of Professional Standards (OPS)** similarly provides an independent team of civilian investigators that reports to the **Civilian Police Review Board (CPRB)** rather than the police chain of command, with mandatory budget support. These structures illustrate how codified investigative staffing standards and independence from city or police attorneys are essential. **Columbus pairs its Civilian Police Review Board with a Department of the Inspector General**, where the Inspector General, appointed by a two-thirds vote of the CPRB and confirmed by the Mayor, manages investigative staff that support CPRB inquiries. This dual structure combines civilian oversight with a professional investigative arm while protecting resources through a charter-guaranteed annual appropriation that cannot be disproportionately cut.

4) Sufficient and Sustained Budget

Oversight only works if it has guaranteed resources that cannot be whittled away year to year. The strongest models tie budget to the size of the police force. **New York City's Civilian Complaint Review Board (CCRB)** is guaranteed by charter a baseline equal to 0.65% of the New York Police Department's (NYPD) uniformed headcount; cuts can only happen if they mirror broader city cuts and are explained in writing. Cleveland goes further: its **Civilian Police Review Board (CPRB)** and **Office of Professional Standards (OPS)** together receive at least 1% of the police budget, and its **Community Police Commission (CPC)** has an independent guarantee of \$1M plus 0.5% of the police budget for community grants. These kinds of formula-driven guarantees ensure stability and prevent political actors from starving oversight when its findings prove inconvenient. For Worcester, adopting a percentage-of-police-budget

guarantee or a staffing-based minimum would provide the durability necessary to build public trust.

If Worcester were to adopt the New York model in FY26, its 466 sworn officers would require approximately 3 investigators (0.65% of headcount), costing \$272,610 to \$302,900 annually assuming \$90,000–\$100,000 per investigator. Under Cleveland's model, 1% minimum of the police budget is dedicated to the Civilian Police Review Board (CPRB), which holds hearing, makes rulings, and recommends policy changes, and the Office of Professional Standards (OPS), which is the staff of qualified civilian investigators and an administrator appointed through a merit-based process, ensuring independence from police command. Board members themselves are compensated modestly, reflecting the expectation of sustained professional engagement rather than symbolic volunteer service. **If Worcester adopted this approach in FY26, 1% of the Worcester Police Department's \$61,003,404 budget would equal \$610,034, providing a floor for investigative staff, administrative support, and board operations.**

5) Selection and Appointment of Board Members

Just as a sufficient budget ensures independence, so too does the selection process of board members. A mix of appointing authorities can ensure that board members do not feel indebted to the person(s) that appointed them. In **Hartford**, for example, the mayor appoints eight of the members of the board with the approval of the Court of Common Council, and the commission on human relations appoints the ninth member. In any case, one way to make appointments that ensures independence is to—so to speak—use “many hands.” For example, one could imagine a system where (1) names are recommended to the City Manager, (2) the City Manager picks from those names, and (3) the City Council approves them. That ensures that the board has some political independence from one person or group appointing them. Ensuring some degree of political independence of the board, insofar as municipal and state law allows, is important no matter who the appointing authority is—whether that is a city manager, a mayor, or a city council.

6) Limits on Police Representation in Oversight Roles

Ferguson sets wide eligibility restrictions for its Civilian Review Board, making ineligible current or past FPD employees, their spouses, city employees or their spouses, and elected officials or their spouses. **Oakland** bars current and former sworn OPD officers, police union employees, and city employees from serving on its oversight bodies. **Boston** prohibits both OPAT staff and Civilian Review Board members from being current law

enforcement officers. **Cleveland** restricts current and former CPD employees from serving in the Office of Professional Standards, which handles independent investigations, but does not bar them from the Civilian Police Review Board that rules on those cases. **New York City** imposes no limits on law enforcement representation within the Civilian Complaint Review Board (CCRB), which investigates misconduct complaints, but its Independent Police Investigation and Audit Board (IPIAB)—a separate body that conducts corruption audits and independent investigations—does prohibit its members from holding other public office or employment.

7) Representative and Inclusive Membership

Civilians charged with oversight of complaints against the police should reflect the demographic diversity of Worcester. At the very least, a review board should consist of people from across the city, of different races, ethnicities, ages, genders, sexual orientation, and incomes. Just as the police should reflect the community they serve, so too should its oversight. How this is ultimately achieved is different in every community that has an oversight agency, but many include language in their ordinances or founding documents that indicate what is required. For example, **Cambridge's Police Review and Advisory Board (PRAB)** ordinance states that the City Manager must make every effort to ensure that the PRAB "fairly and accurately" represents the City's racial, social, and economic composition. In **Hartford**, the Civilian Police Review Board (CPRB) includes members recommended to the Mayor by the City Council and/or through a community recommendation process; but, in addition, specifically includes a non-voting young adult member, as well as at least one previously "justice-involved" person. This may well be reasonably achieved through a requirement that members represent a variety of city council districts, as well as potential limits in where at-large members can live (i.e., no more than one at-large member per district).

8) Member Training Requirements

Some locales might be concerned with civilians, without law enforcement experience, reviewing police investigations. One way to alleviate those concerns is to ensure that all members of the board are trained in police practices and procedures, redacted information, civil rights law, mediation and complaint assessment, and personally protected information (or PPI). Onboarding of new board members is very important, as are regular trainings to keep abreast of new police practices, policy changes, and updates to the law. **Hartford** board members must undergo training in the policies and procedures of Hartford's Police Department. New Haven's civilian review

board must, in its annual report, list its plan for the training of its members in the coming year.

9) Access to Police Data Systems

Boston's OPAT staff are explicitly tasked with collecting and publishing complaint data, stop-and-frisk statistics, use-of-force incidents, and payouts, ensuring oversight is grounded in comprehensive information. **Oakland** mandates **next-day sharing of complaints** with the CPRA and grants it full access to Oakland Police Department (OPD) databases, subject only to narrow legal limits. **Cleveland's** charter states that OPS has guaranteed access to all Cleveland Division of Police records with compelled cooperation from the Chief, and reports only to the CCRB, not police command. These models show that effective oversight requires not just the right to request files, but a statutory entitlement to continuous, routine access to police data and investigations.

10) Subpoena Power

Without the ability to compel testimony and documents, oversight is toothless. The strongest models give subpoena power directly to the board or its staff, without requiring city legal department approval. **New York City's Civilian Complaint Review Board (CCRB)** can issue subpoenas by majority vote, delegate issuance to its executive director, and enforce through court action. **Cleveland's Civilian Police Review Board (CPRB) and Community Police Commission (CPC)** both hold broad subpoena power over documents, witnesses, and evidence, making compliance non-negotiable. **Boston's Office of Police Accountability and Transparency (OPAT) Commission** can issue subpoenas with a two-thirds vote, enforceable in Superior Court. By contrast, weaker models like **Columbus** require city attorney approval, which dilutes independence. For Worcester, subpoena authority should be vested in the oversight body itself, as far as Massachusetts' law allows, with enforcement mechanisms clearly defined.

11) Transparency in Investigation Results

One of the many reasons that people might want a civilian review board is a belief that the timelines, processes, and results of complaint investigations lack transparency. Some investigations might become public right away, some might only become public after a certain amount of outcry, and some might not ever become public. An oversight agency, especially one concerned with public trust and legitimacy, should be transparent about its investigation results (so long, of course, as that transparency does not break any kind of confidentiality law or personally protected information). As NACOLE has written, "for an independent entity to bring transparency to [a] historically opaque process is a fundamental goal

and component of civilian oversight. Civilian oversight provides a unique opportunity for the public to learn about misconduct complaints and other areas of the law enforcement agency that serves the community” (Vitoroulis 2021, 69). The **Providence External Review Authority (PERA)** notifies the complainants and police officers “in a timely fashion” regarding the status or disposition of their complaint. In **Cambridge**, the board is required to make the final disposition of complaints public, the board secretary keeps a public docket of complaints and the disposition of each complaint, the “board shall issue a written response to complaints and it shall deliver a copy of its response and/or findings to all parties” and “any report or action involving a civilian complaint shall be made public.” In **Hartford**, following the investigation of the inspector general, the review board will send its findings and determinations to the police chief, and concurrently send them to “the citizen complainant and to the relevant community-based agencies.”

12) Regular and Public Reporting

In a similar vein as the transparency of individual investigation results, the oversight agency should be issuing at least annual reports summarizing its investigations, analyzing patterns of complaints and their dispositions, and in general being self-reflective of their own work and the work in the year ahead. Similarly, keeping the City Manager and City Council abreast of its regular and ongoing work is helpful in maintaining the board’s accountability to the city and to the public at large. Annual reporting, pattern analysis, and the like are not uncommon among civilian review boards. **Cambridge’s PRAB** makes quarterly reports about its handling of complaints and plans for the future. **The Providence External Review Authority** makes bi-annual reports about its activities, including analysis of complaint trends, and its own expenditures. **Hartford’s Civilian Police Review Board** must issue an annual report that is relatively detailed; its report must include the “type and number of complaints filed, the number and identity of police officers complained against and the number and identity of police officers ... against whom multiple complaints were received, and [their] disposition, the identity of police officers with either more than two complaints in the past twelve-months or more than five in the past ten years, and the dollar value of any settlements ordered and/or paid arising out of citizen complaints, provided such disclosure does not violate a confidentiality agreement.” The chief of police in Hartford must also release an annual report indicating any discipline or assistance given to officers and employees who received multiple complaints.

13) Opportunities for Community Listening and Engagement

In trying to gain or maintain public trust and legitimacy, residents need to know that the board exists, can receive complaints, and will report back to the public with complaint disposition. A board might only be as effective as far as it actually receives complaints and takes public feedback. In Providence, the external review authority is specifically tasked with doing outreach to inform the public of it and its practices, and must do so in several languages. While not specifically within the ordinance, **Cambridge’s** FY26 budget notes that the PRAB must conduct education and outreach to increase public awareness of the board, as well as to educate the public about police procedures.

14) Handling of Disciplinary Recommendations

While review boards might recommend discipline to the Police Chief, in many it is up to the Police Chief whether to follow those recommendations. Civilian oversight might recommend discipline but generally cannot enact it. While review boards review complaints and process investigations, some in the community might feel that they are ultimately useless if they have no role to play in discipline where it might be warranted. That is why it is helpful here to have some transparency on the part of the police themselves: if the board recommends discipline, and the Police Chief disagrees with that discipline, the Chief should, at the very least, respond in writing to the agency that (1) the particular discipline was not provided, (2) what discipline was ultimately given, and (3) the reasoning for the disagreement. One potential way to limit disagreements over discipline is to come to a common agreement, between the board and the police, of a “disciplinary matrix” that sets out in advance which actions should result in what sorts of punishment. At the very least, such a matrix provides a baseline expectation of what to expect an oversight agency to propose upon completion of its review. In any case, **Providence** requires written explanations for the chief’s decision, and **Hartford** allows for an independent arbitrator if the chief’s decision differs from that recommended by the board.



CONCLUSIONS AND FINAL THOUGHTS

Calls for civilian oversight of law enforcement are not uncommon in the United States, and Worcester has revisited this issue repeatedly for more than five decades.

The Worcester Regional Research Bureau recommends that a civilian oversight entity of the Worcester Police Department be established to increase public transparency, strengthen accountability, and build trust between the community and law enforcement. This step complements policy changes undertaken by the current city administration and WPD since CNA's racial equity audit and the Department of Justice's pattern-or-practice investigation.

Research from the National Association for Civilian Oversight of Law Enforcement has shown that more than half (56%) of the 200 most populous cities in the U.S. have some form of civilian review of the police, including, in Massachusetts, Boston and Springfield. Oversight across the nation has grown in fits and starts for more than 100 years; in other words, Worcester can draw from a deep well of models, principles, and practices, including those in Cambridge, Providence, Hartford, and New Haven and innovative cities from across the country. Civilian review can take many forms—a board reviewing complaints about police, an independent auditor or inspector general, or even a hybrid of the two. What defines the practice is that it is civilian-led: complaint review conducted by individuals outside of law enforcement.

At times, suggestions of review (including in Worcester) have been met with the argument that such oversight agencies are not experts in policing. But appropriate training and access to expertise can mitigate such concerns. Moreover, the independence of civilian oversight is itself a strength: **history has shown that internal police investigations—even within professional standards bureaus—can fail to hold fellow officers fully accountable, whether due to conflicts of interest, organizational culture, or reluctance to challenge colleagues.** Civilian oversight introduces a level of impartiality and distance that builds public credibility.

As the Research Bureau noted in its 1994 report on civilian review, an initial lack of technical expertise is not uncommon among similar bodies—"the expectation that reasonable laymen can judge matters in which they are not technical experts forms the basis, for instance, of the jury system" (Bureau 1994, 9). Just as jurors are entrusted to weigh evidence in complex criminal trials, civilians can be entrusted, with training and support, to evaluate complaints of misconduct. **In fact, involving members of the community provides a perspective that professional police investigators cannot bring: an understanding of how policing practices are experienced by the public.**

Civilian oversight is therefore not a replacement for professional expertise, but a necessary complement to it. By combining training, outside expertise, and the independence of community members, Worcester can establish a process that is more transparent, credible, and trusted than leaving accountability solely in the hands of law enforcement.

The implementation of civilian oversight is not about punishment; it is about creating a transparent and credible process that benefits both the public and the police. Worcester's history makes clear that calls for oversight return whenever trust is shaken, from the Rib Crib events in 1970 to the Department of Justice's 2024 Pattern-or-Practice report. Civilian oversight is not a symbolic measure but an important step toward ensuring accountability, transparency, and public confidence in the city's safety institutions. A new system could centralize many of the responsibilities currently divided among the EODEI, Human Rights Commission, and Bureau of Professional Standards, allowing those entities to take on a broader focus on citywide equity and human rights while one body specializes in police accountability. Alternatively, civilian oversight could be integrated into the existing decentralized structure, strengthening coordination and transparency across agencies. **In either case, the goal is to create a robust accountability system.**

Civilian oversight will require resources, careful planning, and attention to municipal and state law, collective bargaining agreements, and Worcester's city charter. These frameworks may shape how an oversight body can be structured, but they need not prevent the City from moving forward. **We should all recognize that developing a strong civilian oversight system should be a deliberate process that prioritizes getting it right rather than doing it quickly,** requiring thoughtful participation from the City Administration, WPD, EODEI, the City Council, the public, and other stakeholders in shaping its form. By identifying and addressing such considerations thoughtfully, Worcester can design a system that is both legally sound and responsive to community expectations. While the creation of civilian oversight will take time, and will require transparent deliberation, Worcester is not starting from scratch. **This report provides a blueprint for success: NACOLE's 13 effective principles and 14 key practices (outlined in Section 3) offer clear guidance for how to establish a system that is both effective and sustainable.**

The Research Bureau believes that creating a local civilian oversight entity is not simply worthwhile—it is a necessary initiative to advance transparency, accountability, and trust in Worcester's policing for years to come.



NOTES ON THE TEXT

¹ (page 3) American democracy is at its best when we continue to find new ways to live up to its founding principles—especially the idea of checks and balances. While elected officials and appointed leaders play a vital role in providing oversight, many scholars and practitioners now recognize that local democracy is strongest when community members also have opportunities to participate in shaping, reviewing, and improving government practices. Across the country, cities adopt new tools that bring residents, public servants, and community organizations together to solve problems. As public challenges grow more complex, collaboration and shared responsibility have become essential. Research by Rosemary O’Leary and Tina Nabatchi (2005) shows how government agencies are increasingly using approaches like deliberative forums, participatory budgeting, and community mediation to ensure the voices of residents are reflected in decisions that affect them. These processes give people a seat at the table, help surface concerns early, and build stronger relationships between communities and public institutions.

Other experts like John Bryson and Barbara Crosby (2014) highlight the value of cross-sector collaboration, where government works alongside nonprofits, businesses, and community members to deliver services and shape policies. This kind of partnership doesn’t replace the role of government—it enhances it. When public institutions invite broader participation, they gain new insight, strengthen legitimacy, and improve their ability to meet public needs. At the same time, it is important to be cautious that collaboration does not become a means for government to offload core responsibilities onto nonprofit organizations, a trend that has raised concerns in some communities.

Robert and Janet Denhardt (2000) have also emphasized that public servants are most effective when they work with communities, not just for them. In their view, people aren’t just customers of government services—they’re active participants in shaping how those services are delivered. Public employees, including city staff and police officers, are essential partners in this work, helping to build trust, foster open communication, and keep the focus on shared goals.

This broader view of democratic participation is especially relevant in conversations about civilian oversight of police. In many cities, community-driven oversight models—like review boards or inspector general offices—have been developed not to undermine police, but to support them. These efforts can help departments enhance transparency, build public confidence, and work proactively to prevent misunderstandings or misconduct. When structured thoughtfully and collaboratively, oversight can serve as a shared tool for building trust and achieving better outcomes, especially in communities that have historically felt unheard.

Ultimately, thinking creatively about how we balance power and who participates in oversight can strengthen our local democracy. These efforts affirm that community members aren’t just recipients of policy—they are essential partners in making government more responsive, inclusive, and effective. When we work together across roles and responsibilities, we build the kind of city where everyone has a voice—and everyone benefits.

² (page 6) For example, an oversight agency might be structurally independent from local law enforcement, but its members or staff might not feel that they have political independence. A lack of political independence can take many shapes: it could be that board appointments are done in an opaque way by one person; it could also be a community that rejects the board if it does not take the positions that it wants them to take after the facts have been laid out. See (Schaible 2024, 4–5).

³ (page 13) Though, as noted in a 1991 interview with the outgoing Eleanor Hawley, who served as Executive Director of the Human Rights Commission for 10 years, keeping the board fully appointed in the early 1990s did not seem to be much of a priority (Frain 1991).



BIBLIOGRAPHY

- About POST – MA POST Commission. (n.d.). Retrieved September 12, 2025, from <https://mapostcommission.gov/about-post/>
- Bass, Adam. 2025. "Does Worcester's Mayor Support a Police Oversight Board? It's Complicated." *MassLive*, March 27, 2025, sec. Worcester. <https://www.masslive.com/worcester/2025/03/does-worcesters-mayor-support-a-police-oversight-board-its-complicated.html>.
- Bingham, L.B., Nabatchi, T. and O'Leary, R. (2005), The New Governance: Practices and Processes for Stakeholder and Citizen Participation in the Work of Government. *Public Administration Review*, 65: 547-558. <https://doi.org/10.1111/j.1540-6210.2005.00482.x>
- Bloom vs. City of Worcester, 363 Mass 136 (Massachusetts Supreme Judicial Court 1973). <https://law.justia.com/cases/massachusetts/supreme-court/volumes/363/363mass136.html>
- Bryson, J.M., Crosby, B.C. and Bloomberg, L. (2014), Public Value Governance: Moving Beyond Traditional Public Administration and the New Public Management. *Public Admin Rev*, 74: 445-456. <https://doi.org/10.1111/puar.12238>
- Caushi, Toni. 2025a. "Gaza Ceasefire Petition on Council Agenda." *Worcester Telegram & Gazette (MA)*, January 7, 2025. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F19DF4123A2875EE8.
- . 2025b. "Residents Call for Panel on DOJ Report." *Worcester Telegram & Gazette (MA)*, March 27, 2025. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F19F94689A1C8C5F0.
- Caywood, Thomas. 2008. "How Thorough? How Fair? - When Police Investigate Police." *Worcester Telegram & Gazette (MA)*, December 21, 2008. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F12544515A6811DE0.
- City of Worcester. 2022. *Worcester Home Rule Charter*. <https://www.worcesterma.gov/city-clerk/document-center/city-charter.pdf>.
- Collier, Geraldine A. 1991. "NEW HUMAN RIGHTS ORDINANCE EXPANDS COMMISSION SCOPE." *Worcester Telegram & Gazette (MA)*, January 12, 1991. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EAD82228382670.
- Coping with Police Misconduct in West Virginia* (p. 41). (2004). West Virginia Advisory Committee to the U.S. Commission on Civil Rights. <https://www.usccr.gov/files/pubs/sac/vv0104/vv0104.pdf>
- De Angelis, Joseph, Richard Rosenthal, and Brian Buchner. 2016. "Civilian Oversight of Law Enforcement: Assessing the Evidence." Department of Justice, Office of Justice Programs.
- Denhardt, R.B. and Denhardt, J.V. (2000), The New Public Service: Serving Rather than Steering. *Public Administration Review*, 60: 549-559. <https://doi.org/10.1111/0033-3352.00117>
- Eames, Russell. 1987. "Voters Say 'Nay' to Complaint Officer Position." *Worcester Telegram & Gazette*, November 4, 1987, sec. A.
- Foskett Jr., Steven H. 2021a. "Residents Weigh in on Racism Reforms - Responses to Manager Differ on Removal of School Resource Officers." *Worcester Telegram & Gazette (MA)*, March 4, 2021. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F1810433CF6C6FAD0.
- . 2021b. "Augustus Won't Seek Review Board over Police." *Worcester Telegram & Gazette (MA)*, May 19, 2021. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F18293AC251ED0510.
- Frain, Mary. 1991. "RIGHTS DIRECTOR ENDS JOB." *Worcester Telegram & Gazette (MA)*, June 30, 1991. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EAD8DD00AC27B0.
- Greenberg, Mel. 2020. "AS I SEE IT Worcester Must Revive Independent Police Review Board." *Worcester Telegram & Gazette (MA)*, June 19, 2020. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F17BB658124F5F5B8.
- Hammel, Lee. 1993. "HUMAN RIGHTS GROUP SPURRED TO ACTION BY HERNANDEZ CASE." *Worcester Telegram & Gazette (MA)*, August 6, 1993. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EAD8DDCD3B32860.
- . 2000. "OFFICIALS OPPOSE POLICE REVIEW BOARD \ PANEL WOULD MONITOR COMPLAINT RESULTS." *Worcester Telegram & Gazette (MA)*, March 14, 2000. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EAD846E9D444C40.
- Kindleberger, R. S. (1970, December 2). Rights Commission Scores One Point. *Worcester Evening Gazette*, 21-22.
- Kotsopoulos, Nick. 1995. "FINDINGS WON'T BE ADOPTED \ HERNANDEZ REPORT SOUGHT CITY APOLOGY." *Worcester Telegram & Gazette (MA)*, November 11, 1995. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Asid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADF5B8850D9E05.



- . 1999a. "CIVILIAN REVIEW BOARD PROPOSED \ LUSTER FILES ORDER TO POLICE THE." *Worcester Telegram & Gazette (MA)*, February 3, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA04C6461410.
- . 1999b. "WORCESTER POLICE CHIEF OPPOSES CIVILIAN BOARD." *Worcester Telegram & Gazette (MA)*, February 23, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA11EE3D8770.
- . 1999c. "COUNCIL SAYS RESIDENTS MUST START REFORM." *Worcester Telegram & Gazette (MA)*, February 24, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA12AA44EE83.
- . 1999d. "NEUTRAL PLACE URGED FOR POLICE COMPLAINTS." *Worcester Telegram & Gazette (MA)*, September 28, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFAAD3A21F746.
- . 2015a. "New Police Oversight Proposed - Lukes to Ask Council to Study Feasibility of Civilian Review Panel." *Worcester Telegram & Gazette (MA)*, April 16, 2015. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F154BD8BF93B58070.
- . 2015b. "Council Puts Review Panel in the Trash." *Worcester Telegram & Gazette (MA)*, April 29, 2015. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F15501EB344D95158.
- . 2018. "WORCESTER - Seventy-One Complaints Were Filed Against Member." *Worcester Telegram & Gazette (MA)*, June 7, 2018. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F16C680B8F0603B48.
- . 2019. "WORCESTER - The Number of Complaints Filed Against Police." *Worcester Telegram & Gazette (MA)*, June 4, 2019. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F173DD053C87C5D00.
- Kush, Bronislaus B. 1999a. "POLICE UNIONS BACK ANONYMITY." *Worcester Telegram & Gazette (MA)*, January 29, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA00E44A7567.
- . 1999b. "ACLU SEEKS CIVILIAN POLICE REVIEW BOARD." *Worcester Telegram & Gazette (MA)*, January 30, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA01308F44E4.
- Mansbach, N. (1970a, August 18). Human Rights Subcommittee Named to Study Black Coalition's Demands. *Worcester Telegram*, 16.
- . (1970b, September 22). McGrath to Name Rights Unit Soon. *Worcester Telegram*, 13–14.
- . (1971, February 3). Human Rights Commission Ok'd. *Worcester Telegram*, 15.
- Marino, T. (2025, May 6). *Worcester Human Rights Comm'n Leaders not Reappointed*. <https://thisweekinworchester.com/worcester-human-rights-leaders-out/>
- Mass. General Laws ch. 6E § 1-15
- Models of Civilian Oversight of Law Enforcement*. (n.d.). National Association for Civilian Oversight of Law Enforcement. Retrieved September 12, 2025, from https://www.nacole.org/models_of_oversight
- Monahan, John J. 1998. "RIGHTS BOARD TO REVIEW COMPLAINT \ ALLEGED POLICE ABUSE A CONCERN." *Worcester Telegram & Gazette (MA)*, August 19, 1998. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA9858F40DEB3.
- . 1999. "'INADEQUATE' POLICE REVIEW CRITICIZED \ OFFICERS ESCORT PROTESTERS TO CITY HALL." *Worcester Telegram & Gazette (MA)*, June 23, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA69EA9B5166.
- NACOLE (Director). (2020, September 14). *Civilian Oversight 101* [Video recording]. <https://www.youtube.com/watch?v=BXtBdFuLtyY>
- Nangle, Richard. 1999. "CIVILIAN REVIEW BOARD MODELS ARE CONSIDERED." *Worcester Telegram & Gazette (MA)*, May 13, 1999. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3AAsid/in-foweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3AOfi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EADFA4D71B32EDC.
- O'Connor, J. (1970, August 2). Rib Crib Co-Owner Complains About Police Concentrations. *Worcester Telegram*, 17A-18A.
- Ofer, Udi. 2016. "Getting It Right: Building Effective Civilian Review Boards to Oversee Police." *Seton Hall Law Review* 46: 1033–62.



- Office of the City Manager. 2000. "Administrative Response to Human Rights Commission Report." Worcester, MA: City of Worcester.
- Officer Suspended in Rib Crib Case. (1970, August 6). Worcester Telegram, 17.
- Petrishen, Brad. 2021a. "Civilian Police Review Board Urged - 18 Groups Call for Oversight in Letter." *Worcester Telegram & Gazette (MA)*, May 13, 2021. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F18273E54EC06D408.
- . 2021b. "Board Backs Police Review Panel - Fort: Residents Seeking Change Have Been Disrespected." *Worcester Telegram & Gazette (MA)*, May 28, 2021. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F182C2F8918BE4638.
- . 2023. "Panel: Batista blocking police probe - Chair says documents request denied." *Worcester Telegram & Gazette (MA)*, November 21, 2023. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F195723EB55BD6E00.
- . 2023a. "Oversight of Police to Continue - Batista Misses Meeting After Asking for Pause." *Worcester Telegram & Gazette (MA)*, December 6, 2023. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F195C14FC08CCEE00.
- . 2024a. "Police Union Opposes Review Board - Equity Audit Suggests Citizen Oversight." *Worcester Telegram & Gazette (MA)*, April 1, 2024. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F1982A0EA99EB7F80.
- . 2024b. "Police Oversight Panel on Table - City Manager Says He'll Explore Civilian Review Board." *Worcester Telegram & Gazette (MA)*, December 12, 2024. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F19D6B065DC1047C8.
- Police Officer Under Probe on Complaint by Rib Crib. (1970, August 5). Worcester Telegram, 18.
- Prenzler, T., Allard, T., Curry, S., & Macintyre, S. (2010). Complaints against police: The complainants' experience. *Journal of Criminal Justice Research*, 1(1), 18.
- Richardson, Keri, Steve Rickman, William Taylor, Adriana Volpe, Kaitlin Moloney, and Luther Tyus. 2024. "Racial Equity Audit of the Worcester, Massachusetts Police Department." Arlington, VA: CNA. <https://s3.documentcloud.org/documents/24487848/worcester-police-department-racial-equity-audit.pdf>.
- Schaible, Lonnie M. 2024. "Impediments and Challenges to Civilian Oversight of Law Enforcement." University of Colorado, Denver; National Association for Civilian Oversight of Law Enforcement.
- Stephens, D. W., Scrivner, E., & Cambareri, J. F. (2018). *Civilian Oversight of the Police in Major Cities*. Office of Community Oriented Policing Services.
- Talbot, J. (1970, August 25). City Blacks Press Demand for Board. Worcester Telegram, 1, 14.
- Terrill, William, and Jason R. Ingram. 2016. "Citizen Complaints Against the Police: An Eight City Examination." *Police Quarterly* 19 (2): 150–79. <https://doi.org/10.1177/1098611115613320>.
- Turken, S. (2025, May 5). *Worcester Human Rights Commissioners say city manager refused to reappoint them*. GBH. <https://www.wgbh.org/news/local/2025-05-05/worcester-human-rights-commissioners-say-city-manager-refused-to-reappoint-them>
- United States Department of Justice Civil Rights Division & United States Attorney's Office District of Massachusetts. (2024). *Investigation of the Worcester Police Department and the City of Worcester, Massachusetts* (p. 43). Department of Justice. <https://www.justice.gov/crt/media/1378896/dl?inline>
- Vitoroulis, Michael, Cameron McElhiney, Liana Perez, and United States: Department of Justice: Office of Community Oriented Policing Services. 2021. *Civilian Oversight of Law Enforcement: Report on the State of the Field and Effective Oversight Practices*. Justice Department. <https://purl.fdlp.gov/GPO/gpo159161>.
- Walker, S. (2001). *Police Accountability: The Role of Citizen Oversight*. Wadsworth/Thomson Learning. <http://archive.org/details/policeaccountabi0000walk>
- Wiley, Winston W. 1993. "CITY EXAMINES NEED FOR CRISIS INTERVENTION \ TEAM TO HEAD OFF." *Worcester Telegram & Gazette (MA)*, July 30, 1993. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EAEDEDD6C8121D1D.
- . 1994. "HERNANDEZ GROUP CALLS FOR ACTION." *Worcester Telegram & Gazette (MA)*, January 5, 1994. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EAEDEE516DF51DB6.
- Williamson, Dianne. 1992. "CHANGES URGED IN HANDLING POLICE COMPLAINTS." *Worcester Telegram & Gazette (MA)*, May 14, 1992. America's News. https://infoweb.newsbank.com/apps/news/openurl?ctx_ver=z39.88-2004&rft_id=info%3Aid/infoweb.newsbank.com&svc_dat=NewsBank&req_dat=5F3C0160C5BD4D868F6A67FD6D5FC843&rft_val_format=info%3Aofi/fmt%3Akev%3Amtx%3Actx&rft_dat=document_id%3Anews%252F0EAEDEAA1EE1A5D0A.
- Worcester City Council. 2024. *Part Two, Organization of City Agencies of the Revised Ordinances of 2015*. <https://www.worcesterma.gov/city-clerk/document-center/revised-ordinances-2015-2.pdf>.
- Worcester Human Rights Commission. 1999. "Report of the Five Public Hearings on Human Rights in Worcester." Worcester, MA.
- Worcester Municipal Research Bureau. 1994. "Civilian Review of the Police: The Case For and Against." 94-4. Worcester, MA: Worcester Regional Research Bureau. <https://www.wrrb.org/wp-content/uploads/2015/02/Civilian-Review-of-the-Police-The-Case-For-and-Against.pdf>



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