

From: City of Boston OPAT Civilian Review Board
To: BPD Commissioner Michael Cox
CC: Boston City Councilors, Mayor Michelle Wu, Superintendent Richard Dahill
Date: June 8, 2026
Re: OPAT CRB Policy Memo

1. Introduction

The Civilian Review Board (CRB) of the City of Boston’s Office of Police Accountability and Transparency (OPAT) has the authority under City of Boston Ordinance 12-16.9(f) to: “Provide timely review of existing or proposed Boston Police Department policies and procedures and provide recommendations for the revisions of those policies and procedures to the Police Commissioner.”¹

In light of the above, the CRB submits this memo to the Boston Police Department (BPD) concerning recommendations on BPD policies and procedures. It includes recommendations on the following topics: (A) body worn cameras and (B) decoupling BPD from the federal policing infrastructure.

We appreciate your consideration of these recommendations and stand ready to assist in developing implementation plans consistent with Boston’s commitment to justice, public safety, as well as the BPD’s community policing mission.

2. Policy Issues and Recommendations

A. Body Worn Cameras

Background: In light of the recent killings of two Boston community members by on duty BPD officers, we are in the midst of an intense public dialogue around the BPD’s policies for using force on civilians and around if and when to release bodycam footage of these killings.

Recommendation: CRB recommends an update to BPD Rule 405 regarding Body Worn Cameras (BWC) to release BWC footage of critical incidents to OPAT within 7 days of the incident, and to the public within 30 days of the incident after consulting family members of the alleged victims and survivors. Critical incidents are defined as incidents involving the on-duty discharge of a firearm by a BPD officer or employee, as well as police use of force that results in serious injury or death.

B. Decoupling Boston Police Department from Federal Law-Enforcement Activities

Background

In light of aggressive and violent federal policies targeting our immigrant neighbors, as well as

¹ City of Boston. “AN ORDINANCE ESTABLISHING AN OFFICE OF POLICE ACCOUNTABILITY AND TRANSPARENCY.” Section 12-16.9(f).

the deaths of civilians in Minneapolis in January 2026, the Civilian Review Board writes to express concern regarding ongoing collaboration between the Boston Police Department (BPD) and federal law-enforcement agencies, including the Federal Bureau of Investigation (FBI), the Department of Homeland Security (DHS), and U.S. Immigration and Customs Enforcement (ICE). Boston’s commitment to civil rights and community trust requires that the BPD decouple its local policing activities from federal enforcement practices that undermine the Boston Trust Act and the principle of community-based public safety.

i. Collection and Sharing of Surveillance and Arrest Information with External Agencies

We are deeply concerned about BPD’s practice of collecting and sharing surveillance information with the Boston Regional Intelligence Center (BRIC) and other agencies—particularly when data is gathered from individuals who are not suspected of any crime. The Boston Trust Act was designed to ensure that residents can engage with public safety services without fear of immigration enforcement. As Mayor Michelle Wu has noted, Boston police 'keep us safe by getting to know our residents, not working to remove them.' Yet the collection of data through field interrogation and observation reports, license plate readers, and other surveillance technologies—then shared with BRIC and its partner agencies—risks converting ordinary residents into data points within federal systems.

The structure of BRIC heightens these concerns. The presence of DHS officials within Boston Police Headquarters blurs the line between local and federal law enforcement. Furthermore, DHS grant programs such as the Urban Area Security Initiative (UASI) explicitly encourage cooperation with federal partners. These ties, combined with flawed gang-database practices and the routine sharing of arrestee fingerprints with federal authorities, create pipelines of information that can—and do—feed immigration enforcement systems. In the current climate of aggressive federal enforcement, these relationships undermine the Trust Act’s intent and erode public trust.

The risks extend beyond undocumented residents. Federal authorities have in recent years targeted lawyers, humanitarian workers, political dissidents, and individuals seeking reproductive or gender-affirming healthcare. Information-sharing that enables such actions—even if technically permitted—exposes vulnerable people to unjust consequences and contradicts Boston’s stated commitment to human rights and equitable policing.

Recommendations

- Amend Rule 318(6) of the BPD Rules & Procedures to prohibit the collection and sharing of fingerprints for non-felony arrestees. Officers shall obtain fingerprints for all felony arrests and misdemeanor arrests involving violence, domestic violence, weapons offenses, or when the identity of the arrested person cannot otherwise be satisfactorily established. Fingerprinting for other misdemeanor arrests will require supervisory authorization. Individuals not charged with felonies should not have their biometric data transmitted beyond the Department.
Amend the BRIC Privacy, Civil Rights, and Civil Liberties Protection Policy to restrict the collection of intelligence information to individuals suspected of criminal acts under Massachusetts law, and to prohibit surveillance of those engaged in First Amendment-protected activity.

- Expand reporting requirements on detainer requests: The Boston Police Commissioner should submit a quarterly report to OPAT and the City Council providing statistical breakdowns regarding civil immigration detainer requests and responses by law enforcement officials.

ii. **BPD Cooperation with Federal Agencies**

We remain troubled by BPD’s participation in federal task forces—including the FBI’s Joint Terrorism Task Force (JTTF), FBI-led multiagency task forces, and the ICE/HSI task force. While combating violent crime and terrorism is essential, continued cooperation with federal agencies whose civil-immigration activities target immigrant communities places Boston residents at risk and undermines local accountability.

We are additionally concerned that BPD has not provided timely responses to public records requests regarding these federal partnerships. Transparency is fundamental to accountability; failure to disclose information about task-force agreements or cooperative arrangements prevents lawful public oversight and erodes trust.

Recommendations

- Decouple BPD from federal law enforcement by withdrawing officers from the Joint Terrorism Task Force and ICE/HSI task forces and remove federal officers from working inside BPD headquarters as BRIC team members.
- Publish and regularly update a public list of all formal and informal partnerships, collaborations, or agreements between BPD and federal agencies, including each partnership’s purpose and scope.
- Maintain and publicly release records of all federal information requests to BPD, including the requesting agency, subject matter, and outcome. This includes submitting quarterly reports to OPAT and the City Council containing information concerning section (D)(1)(a)(4) of the Trust Act, specifically for the preceding 3-month period:
 - The number of requests received from ICE-HSI for personal information or information regarding a person’s release date or time, organized by the reason(s) supporting the request; and
 - The number of times personal information or information regarding a person’s release date or time was provided to ICE-HSI, organized by the type of information shared.

iii. **The Trust Act Applies to BRIC and Accountability**

The CRB wishes to remind BPD leadership that “Law enforcement officials and employees of a City Department, Agency, or Commission,” as defined in section (D)(1) of the Boston Trust Act includes those working at the Boston Regional Intelligence Center (BRIC). As such, those working on BRIC matters must be bound by the restrictions in division (D)(1) and the policy changes recommended above, including: Prohibitions on sharing personal information and information regarding a person’s release date or time to ICE-HSI for the purpose of enforcing civilian violations of immigration laws.

Recommendation: The Trust Act and related policies should be understood to be included in BPD Rules & Procedures Rule 102 (Sec. 8)’s mandate for officers to obey and comply with all directives of the Department. Violators of the Trust Act and related policies, including honoring

detainer requests or sharing personal information with ICE-HSI, may be subject to any sanction used by the BPD.

iv. Federal Funding and Grants

We further recommend that BPD and the City decline Department of Homeland Security (DHS) funding that facilitates immigration enforcement, particularly the Urban Area Security Initiative (UASI) grant, portions of which directly fund BRIC operations. Such funding strengthens federal-local entanglement in immigration and intelligence programs and runs contrary to the City's commitment to equity and transparency. Recent reporting has documented new DHS and ICE initiatives using artificial intelligence and social media surveillance to target immigrant and activist communities.

Recommendation: In this context, Boston must adopt a precautionary approach—declining participation in federal programs that expand surveillance infrastructure or create indirect pathways for civil immigration enforcement.

Respectfully,

OPAT Civilian Review Board