

# Massachusetts Takes Important Steps Toward Mandatory Standards for Law Enforcement Interactions with Youth

By Shelley R. Jackson, *Strategies for Youth*\*

More than five years after legislative enactment, the Commonwealth of Massachusetts may be on its way to becoming the first state in the nation to mandate that law enforcement agencies (LEAs) receive state certification regarding their interactions with youth. In January 2026, the Massachusetts Peace Officer Standards and Training Commission (MA POST) gave preliminary approval to a Juvenile Operations Standard (JOS). When the JOS is formally adopted, all of the approximately 350 LEAs in Massachusetts must comply with it. This action represents a significant step forward in recognizing and respecting the needs of the Commonwealth's youth and, if successfully implemented, can be a model for other states.

As a Massachusetts-based, national non-profit policy and training organization dedicated to ensuring the best possible outcomes for youth who interact with law enforcement, Strategies for Youth (SFY) has been actively involved in the JOS promulgation process. SFY has monitored the MA POST's monthly meetings, developed and submitted to the POST a model JOS based on SFY's *12 Model Law Enforcement Policies for Youth Interaction*,<sup>1</sup> commented on draft versions of the JOS, convened meetings of Massachusetts advocates, families, and service providers to gain further insight into their experiences and perspectives, and shared these insights with the POST. SFY is planning

continued advocacy throughout the POST standards promulgation process, as well as in the work that will be needed to translate the JOS into LEA policies, and to ensure the standard's effective implementation.

## Background

In 2020, after George Floyd was murdered in Minneapolis, Minnesota, the Massachusetts legislature enacted a police reform statute.<sup>2</sup> Among other things, this statute created the MA POST and charged the POST with developing eight

unique in requiring the promulgation of a *mandatory youth-specific* standard for *all* LEAs statewide.

## Actions to Date

On June 21, 2021, approximately six months after the enactment of the 2020 police reform statute, the MA POST fulfilled its statutory obligation to issue guidance on “developmentally appropriate de-escalation and disengagement tactics, techniques and procedures and other alternatives to the use of force for minor children.”<sup>6</sup> Among other things,

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mandatory standards for law enforcement agency certification, including standards for Juvenile Operations.<sup>3</sup>

The 2020 legislation gave the MA POST unique responsibilities and authority. Although nearly 40 states and the District of Columbia certify individual law enforcement officers,<sup>4</sup> and one state, Ohio, has established a standard on youth interactions for LEAs that elect to seek state certification or accreditation with that standard,<sup>5</sup> Massachusetts law is

the guidance notes that youth are “developmentally distinct from adults,” incorporates principles of “de-escalation and disengagement” in law enforcement-youth interactions, and addresses the need for law enforcement officer education and training about youth.<sup>7</sup>

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(setting out requirements for agencies that elect to seek state certification or accreditation). In addition, New York State's voluntary law enforcement agency accreditation program includes one standard requiring agencies to have a “written directive” for a procedure to safeguard children when their parents or guardians are arrested. *See* New York State Law Enforcement Accreditation Program Standard 44.4, Safeguarding Children of Arrested Parent(s)/Guardian(s), Standards and Compliance Verification Manual (2025) Standards and Compliance Verification (<https://tinyurl.com/3ue3rz93>).

<sup>6</sup> *See* Massachusetts Peace Officer Standards and Training Commission, Guidance on Developmentally Appropriate De-escalation and Disengagement Tactics, Techniques and Procedures and Other Alternatives to the Use of Force for Minor Children (<https://tinyurl.com/mr2vr3ep>) (2021). SFY provided the POST with draft language for this guidance, which the POST accepted in the final published version.

<sup>7</sup> *Id.*

*See MA POST, next page*

<sup>1</sup> <https://strategiesforyouth.org/model-policies/>

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<sup>2</sup> 2020 Mass. Acts ch. 253.

<sup>3</sup> *See* MGL c.6E, §2, §5. The POST's responsibilities under this statute also include certifying individual law enforcement officers, *see id.*, at § 4, and issuing a “specialized certification” for all school resource officers, *see id.*, at § 3(29) (b).

<sup>4</sup> *See* National Conference of State Legislatures, Law Enforcement Officer Certification Database (2021) (documenting statutory qualifications for law enforcement certification in 37 states and the District of Columbia) at <https://www.ncsl.org/civil-and-criminal-justice/law-enforcement-officer-certification-database>

<sup>5</sup> *See* Ohio Collaborative Community Police Advisory Board, Law Enforcement Certification and Accreditation 2025 Public Report at 18-19 (2025) <https://tinyurl.com/2x4sxr77>; *see also* Ohio Executive Order 2024-05D (March 15, 2024).

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Four years later, on June 26, 2025, MA POST Commissioners publicly considered the draft Juvenile Operations Standard for the first time.<sup>8</sup> The draft required each Massachusetts law enforcement agency to develop and implement written policies that are consistent with the standard.<sup>9</sup> This draft incorporated important principles from legal precedent and social science research—most importantly, the principle that youth are different than adults.

POST Commissioners considered additional revisions to the JOS in November 2025 and January 2026, and gave preliminary approval to the standard on January 15,

The January 2026 draft JOS includes revisions made in response to comments from SFY, such as adding an explicit requirement that LEAs develop policies on investigatory stops of youth, and requiring LEA policies to direct officers effectuating arrests of youth to act in accord with bias-free policing principles.<sup>12</sup> The POST also responded to SFY when it added more comprehensive and proscriptive language on sexual conduct and sexual relationships between officers and youth, including by requiring LEA policies to prohibit relationships, conduct and sexual harassment that violate “any applicable law, rule, regulation, policy, or judicial or regulatory order,” and mandating that LEA policies address

revisions considered and voted on by POST Commissioners.

### **Analysis of the Draft Juvenile Operations Standard: Several Positive Aspects, Along with the Need for Additional Clarification and Protections for Youth**

The most positive aspect of the draft JOS is that it requires LEA policies to convey that officers should understand the developmental differences between youth and adults, and incorporate that understanding into their interactions with youth. For example, the draft standard requires that LEA policies inform officers about the ways in which youth may react to officers’ presence; that certain behavioral responses by youth may reflect lack of developmental maturity, rather than criminal intent; and about youths’ vulnerabilities, including vulnerability to intimidation, coercion, and threats.<sup>14</sup>

The draft JOS also requires LEA policies to treat youth as “vulnerable persons,” including by: directing officers to use developmentally and age appropriate, trauma informed, racially equitable, and culturally relevant tactics; providing officers with “specific and comprehensive requirements” regarding the use of force and use of restraints; directing officers to timely address medical needs; directing officers to consider “appropriate alternatives” to arrest, incarceration, and hospitalization; and directing officers to make efforts to connect people in need to appropriate support services.<sup>15</sup>

In sum, as currently written, the Juvenile Operations Standard represents significant progress in moving the Commonwealth toward youth policing practices that will be more effective, and safer for both youth and officers. Statewide implementation of the JOS will help to ensure consistency and uniformity in youth-police interactions, thereby diminishing the possibility for youth justice to be meted out by geography. SFY is encouraged by this progress.

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## ***The draft requires law enforcement agencies to issue policies designed to ensure that officers understand the developmental differences between youth and adults, and incorporate that understanding in their interactions with youth.***

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2026.<sup>10</sup> The strengths of the January 2026 draft JOS include its description of how the differences between youth and adults affect officer-youth interactions, its requirement that officers use the “least intrusive action that is effective under the circumstances” in youth encounters, and its requirement that LEAs develop policies for a wide range of officer-youth interactions.<sup>11</sup>

<sup>8</sup> See Public Meeting—MA POST Commission (proceedings of the June 26, 2025 MA POST meeting) at <https://mapostcommission.gov/event/public-meeting-66/>

<sup>9</sup> See MA POST Agency Certification Standards—Juvenile Operations (Draft) (June 26, 2025) at <https://tinyurl.com/2syrzwtr>

<sup>10</sup> See Public Meeting—MA POST Commission (proceedings of the Jan. 15, 2026 MA POST meeting) at <https://mapostcommission.gov/event/public-meeting-74/>

<sup>11</sup> See MA POST Agency Certification Standards—Juvenile Operations (Draft) (Jan. 15, 2026) at <https://tinyurl.com/mv3h56up>. The draft JOS requires LEAs to develop youth-specific policies regarding: investigatory stops and searches; arrests; transporting youth; sexual relationships between officers and youth; the treatment of youth when their parents or caretakers are arrested or the subject of a residential search warrant; officer conduct when youth are involved in the child welfare system; institutions of higher education; school resource officers; LEA participation in community engagement programs; complaint procedures; annual analysis and reporting on trends in officer-youth interactions; and officer training.

prohibited and permissible communications between officers and youth.<sup>13</sup>

SFY found the POST and its legal counsel to be responsive to input from stakeholders. In fact, the POST’s public record includes the written input submitted to the POST about the JOS and other standards, legal counsel’s proposed responses to input, counsel’s rationale for these responses, and any resulting

<sup>12</sup> Massachusetts law defines “bias-free policing” as “policing decisions made by and conduct of law enforcement officers that shall not consider a person’s race, ethnicity, sex, gender identity, sexual orientation, religion, mental or physical disability, immigration status or socioeconomic or professional level. This definition shall include policing decisions made by or conduct of law enforcement officers that: (1) are based on a law enforcement purpose or reason which is non-discriminatory, or which justifies different treatment; or (2) consider a person’s race, ethnicity, sex, gender identity, sexual orientation, religion, mental or physical disability, immigration status or socioeconomic or professional level because such factors are an element of a crime.” MGL c.6E, §1. The draft JOS includes a requirement that LEA policies direct officers to “act impartially and avoid the appearance of bias, and not harass or discriminate against others based on bias.” See MA POST Agency Certification Standards—Juvenile Operations (Draft), 555 CMR § 13.03(6)(a).

<sup>13</sup> See MA POST Agency Certification Standards—Juvenile Operations (Draft), 555 CMR § 13.03(6)(q).

<sup>14</sup> See MA POST Agency Certification Standards—Juvenile Operations (Draft), 555 CMR § 13.03(6)(c),(d).

<sup>15</sup> See MA POST Agency Certification Standards—Juvenile Operations (Draft), 555 CMR § 13.03(6)(d)2; see also Agency Certification Standards—Officer Response Procedures (Draft), 555 CMR § 13.03(4)(c) (Sept. 15, 2025) (setting out the requirements for LEA policies on interactions with vulnerable people).

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However, there is still room for improvement. In some areas, SFY believes the draft JOS should be more comprehensive and more protective of youth. For example, although the draft acknowledges the need for law enforcement approaches that recognize “mental or physical condition,” the draft standard does not incorporate recommendations that LEA policies provide more specific guidance for officers on how to recognize potential disabilities, and on how to respond to youth with disabilities. Massachusetts parents and advocates have expressed concerns that officers’ lack of awareness of and training about disability has led to unnecessary arrests and use of force with youth. More specific guidance on disability issues could address these problems, and would also support law enforcement agencies in meeting their legal obligation to comply with the non-discrimination requirements of the Americans with Disabilities Act.<sup>16</sup>

In addition, the Juvenile Operations Standard should give more explicit direction to LEAs about agency and officer involvement when youth are targeted or affected by immigration enforcement activities. Although the draft states that LEA policies concerning these youth must be consistent with bias-free policing principles<sup>17</sup>, the JOS fails to provide any other substantive guidance for agency practices or officer conduct.

SFY believes for several reasons that the JOS must set out explicit, *statewide* expectations for agencies and officers. Federal immigration agencies have targeted Massachusetts for enforcement actions since at least August 2025, including by identifying Boston, Massachusetts as a purportedly unlawful “sanctuary jurisdiction.”<sup>18</sup> As of March 2026, however, there is no state-level guidance

from the Executive Branch to Massachusetts LEAs about what they should or should not do when federal immigration enforcement activities occur in their jurisdictions.<sup>19</sup> There is also no apparent state-level oversight of LEAs who become involved in federal immigration actions. The lack of guidance and oversight is all the more troubling in light

of information-sharing and cooperation with federal immigration agencies.<sup>21</sup>

Moreover, based on SFY’s years of experience with law enforcement agencies in Massachusetts and throughout the country, we firmly believe that the Juvenile Operations Standard must be complemented by model policies. Like their counterparts in other states, Massachusetts

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of recent incidents where local police were involved when Massachusetts youth themselves, or their parents or caregivers, were the subject of federal immigration actions,<sup>20</sup> and indications that many Massachusetts LEA policies enable a range

of officers generally lack the training needed to consistently interact with youth in a manner that is as effective and least intrusive as possible. LEA leaders also often lack the foundational knowledge to provide guidance to officers in this area. SFY has urged the MA POST to create and release a model Juvenile Operations policy as a way to increase the likelihood that implementation of the JOS will be consistent across the Commonwealth. Thus far, however, the POST has not committed to doing so.

**Other Important Standards—Youth Interviews and Interrogations**

In addition to monitoring the development of the Juvenile Operations Standard, SFY has advocated with the POST as it develops policies outside of the JOS that will impact youth. As a key example, the POST has developed and given preliminary approval to a draft Criminal Investigation Standard (CIS), which governs how law enforcement agencies receive reports of and investigate alleged criminal activity. SFY is particularly interested in how this standard addresses non-custodial interviews and custodial interrogation of youth, including requirements for how officers advise youth of their rights.<sup>22</sup>

<sup>19</sup> See Protections for Immigrant Communities at <https://www.mass.gov/protections-for-immigrant-communities> (Massachusetts Attorney General webpage providing immigration-related guidance to patients and health care providers, immigrant students, Massachusetts schools and post-secondary institutions, and immigrant workers, but lacking any resources for law enforcement). The Massachusetts Chiefs of Police Association issued a “legal advisory” on immigration for Massachusetts police chiefs in May 2025, see Advisory Cooperation with Immigration Officials at <https://tinyurl.com/3wkmzfyu>, but this advisory does not carry the weight of guidance from state leaders such as the Governor or the Attorney General.

<sup>20</sup> Examples include: teenagers in two jurisdictions who were arrested by local police and then taken into custody by ICE at police headquarters, see Protesters question Everett officials after police arrest of 13-year-old leads to ICE detention | GBH at <https://tinyurl.com/5e97w6v5>; 3 teens released by Chelsea, MA police, then arrested by ICE—NBC Boston at <https://www.nbc.com/news/local/chelsea-massachusetts-ice-arrest-video/3709749>; Chelsea student arrested by police, detained by ICE after school altercation—NBC Boston at <https://www.nbc.com/news/local/chelsea-williams-high-school-altercation-ice-arrest/3714068/>; a 16-year-old whom local police took to the ground and then took into custody during an immigration enforcement action where ICE detained and took away her mother, see Massachusetts police hold girl’s face to the ground as ICE arrests her mother, video shows at <https://tinyurl.com/5224r9rj>; and a 12-year-old left alone on the street after ICE detained the adult whom he was with, see 12-year-old boy left alone on sidewalk after ICE raid in Massachusetts—CBS Boston at <https://www.cbsnews.com/boston/news/waltham-mass-ice-arrest-boy-left-alone/>.

<sup>21</sup> See Citizens for Juvenile Justice, Written Testimony to the Massachusetts Joint Legislative Committee on Racial Equity, Civil Rights and Inclusion (Nov. 21, 2025); see also WGBH, Some local police, sheriff and DA offices are communicating often with ICE, records show, <https://tinyurl.com/4pjj66ur8>.

<sup>22</sup> The JOS includes a cross-reference to CIS provisions on administering *Miranda* warnings to youth and conducting custodial youth interrogations. See MA POST Agency Certification Standards—Juvenile Operations (Draft) 555 CMR 13.03(6)(f)5.

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<sup>16</sup> See 42 U.S.C. § 12102(1)(A), 28 C.F.R. Part 35.

<sup>17</sup> See MA POST Agency Certification Standards—Juvenile Operations (Draft), 555 CMR § 13.03(6)(k).

<sup>18</sup> See ICE Has Begun Immigration Crackdown in Massachusetts. *The New York Times* (Sept. 6, 2025) at <https://www.nytimes.com/2025/09/06/us/politics/ice-operation-boston.html>; see also Office of Public Affairs | Justice Department Publishes List of Sanctuary Jurisdictions | United States Department of Justice (Aug. 5, 2025) at <https://www.justice.gov/opa/pr/justice-department-publishes-list-sanctuary-jurisdictions>; and Executive Order 14287 (April 28, 2025) Federal Register : Protecting American Communities From Criminal Aliens at <https://tinyurl.com/mr2yca53>

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POST Commissioners gave preliminary approval to the draft CIS in November 2025. SFY is pleased that the draft CIS includes a number of protective requirements for LEA policies on non-custodial interrogations of youth. The draft CIS requires that LEA policies direct officers to explain, in developmentally and age appropriate, trauma informed, racially equitable and culturally relevant language, that the officer wants to interview

CIS language allowing the use of deceit and deception in youth interrogations. Initial drafts of the CIS considered by POST Commissioners contained an explicit prohibition on the use of deceit and deception in youth interrogations. SFY endorsed this prohibition, which was consistent with Supreme Court precedent and social science research about youths' susceptibility to coercion in interrogations, and their resulting likelihood to unknowingly waive their rights and make false confessions.<sup>25</sup>

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***SFY strongly opposes the POST's decision to preliminarily approve language allowing the use of deceit and deception in youth interrogations.***

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the youth, the purpose of the interview, and the youth's rights. The draft standard also requires that LEA policies direct officers to give the youth's parent, guardian or other interested adult the opportunity to be present for the interview, and directs officers that they can begin interviews only after obtaining the youth's "clear and unambiguous" understanding that the interview is voluntary and that the youth is free to end the interview.<sup>23</sup>

With respect to custodial interrogations of youth, however, the draft CIS contains both protective language and language that could lead to the exposure and exploitation of youths' vulnerabilities. On the positive side, in addition to requiring that LEA policies direct officers to explain the purpose of the interrogation and the youth's rights developmentally and age appropriate, trauma informed, racially equitable and culturally relevant language, the draft CIS requires that LEA policies direct officers to explain to interrogated youth the consequences of waiving their *Miranda* rights, and requires that any waiver of *Miranda* by a youth be "clear and unambiguous." The draft CIS also requires that LEA policies prohibit "any conduct for the purposes of threatening, intimidating, or unlawfully coercing a youth."<sup>24</sup> SFY supports all these protections.

However, SFY strongly opposes the POST's decision to preliminarily approve

In November 2025, however, the POST gave preliminary approval to language that would weaken protections for youth in custodial interrogations.<sup>26</sup> The POST made this change after receiving input from the Municipal Police Training Committee (MPTC), a state agency that is responsible for developing and delivering training for Massachusetts law enforcement, and which has substantial representation from law enforcement leadership. According to POST Legal Counsel, the MPTC asserted that deception is a "valid investigatory tool" that has been permitted by Massachusetts'

highest court.<sup>27</sup> In response, legal counsel proposed, and POST Commissioners preliminarily approved, revised language that would allow officer deceit in youth interrogations unless the deception was "excessive or unreasonable."<sup>28</sup>

**Next Steps and the Future of Juvenile Standards in Massachusetts (and Hopefully, Elsewhere)**

As of March 2026, the MA POST has not announced a date by which it expects to publish the draft Juvenile Operations Standard or any other LEA standards for formal public comment. SFY will participate in the public comment process. We are also urging youth advocates to be prepared to provide comments that both recognize the protective aspects of these standards and push for stronger and more specific language where needed. In addition, although the formal adoption of the JOS and other standards relevant to youth will be a significant milestone, these standards will still need to be implemented through LEA policies, officer training, and changes in practice. SFY therefore expects to be involved in this work for some time to come.<sup>29</sup>

SFY hopes that Massachusetts' experience in developing mandatory statewide law enforcement agency standards for youth interactions will lead other states to take similar action. Statewide LEA certification can be an important vehicle to promote policing approaches that demonstrate an understanding of youths' unique vulnerabilities, and operationalize that understanding through policy. Moreover, through certification, states and localities can move away from flawed practices that have all too often exposed youth to trauma, harm, and disparities, deprived officers of needed guidance, and failed to promote public safety. ■

<sup>25</sup> See *J.D.B. v. North Carolina*, 564 U.S. 261, 269 (2011) (the risk of false confessions "is all the more troubling – and recent studies suggest, all the more acute – when the subject of custodial interrogation is a juvenile."). See also Joshua A. Tepfer et al., *Arresting Development: Convictions of Innocent Youth*, 62 Rutgers L. Rev. 887, 919 (2010) (Many youth "do not understand the full range of consequences that flow from a decision to waive [*Miranda*] rights and speak with police officers. Further, many youth are incapable of asserting those rights in the often intimidating presence of their interrogators.") See also *id.*, at 917-18 (When police interrogators question youth using "the same leading and manipulative tactics" that would be used for adults, "[t]he result is that statements taken from children and adolescents under aggressive police interrogation are systematically unreliable," where "young defendants who are already predisposed to yield to their interrogators' suggestions are able to construct realistic-sounding false statements based on the information included in the very questions posed by police.")

<sup>26</sup> See Public Meeting—MA POST Commission (Proceedings of the November 20, 2025 MA POST meeting) at <https://mapostcommission.gov/event/public-meeting-71/>

<sup>27</sup> See Public Meeting—MA POST Commission (Proceedings of the September 25, 2025 MA POST meeting) at <https://tinyurl.com/5h8ywerj>. SFY believes that the case the MPTC apparently relied on, *Commonwealth v. DiGiambattista*, 442 Mass. 423 (Mass. 2004), is of limited relevance to the JOS. *DiGiambattista* concerns adult defendants and was decided seven years before the Supreme Court addressed juveniles' susceptibility to false confessions in *J.D.B.*

<sup>28</sup> See MA POST Agency Certification Standards—Criminal Investigation Procedures (Draft), 555 CMR § 13.03(5)(j)2.a.

<sup>29</sup> For example, on March 2, 2026, SFY submitted comments to the POST and the MPTC on a proposed Model Use of Force Policy for LEAs. Our comments focused on the Model Policy's impact on youth, including comments designed to better integrate the Model Policy with the draft JOS and other relevant standards.

<sup>23</sup> See MA POST Agency Certification Standards—Criminal Investigation Procedures (Draft), 555 CMR § 13.03(5)(i) (Nov. 20, 2025) at <https://tinyurl.com/h9v2vt4f>

<sup>24</sup> See *id.*, at 555 CMR § 13.03(5)(j)1-2.