

**Andrea L. Stone**  
**Public Records Coordinator**

City of Springfield  
Office of the City Clerk  
36 Court Street  
Springfield, MA 01103  
Office: (413) 736-3111  
Fax: (413) 787-6502



**THE CITY OF SPRINGFIELD, MASSACHUSETTS**

September 13, 2019

**VIA EMAIL: [efalcon@aclum.org](mailto:efalcon@aclum.org)**

Emiliano Falcon, Esq.  
ACLU  
211 Congress Street  
Boston, MA 02110

*Re: Public Records Request #R001404-090319*

Dear Attorney Falcone:

This letter is in response to your public records request to the City of Springfield.

ACLUM seeks records relating to the use of facial recognition technology by any part of the Springfield Public Schools ("SPS"). We request documents pertaining to SPS's use of facial recognition technology in schools, administrative buildings, and other SPS properties across the City of Springfield. The records we seek include but are not limited to those pertaining to or describing any relationship with any public and private entities as it relates to this technology.

ACLUM requests the following records created on or after January 1, 2015, unless another time period is otherwise specified:

**Request #1.** Documents relating to SPS purchase, trial, testing, piloting or use of facial recognition, including but not limited to: purchase orders, RFPs, licensing agreements, invoices, and contracts (including non-disclosure agreements) related to any facial-recognition product or service;

**Response #1.** Personnel in the Springfield Public Schools ("SPS") have advised this office that there are no records that are responsive to your request for documents relating to SPS purchase, trial, testing, piloting or use of facial recognition, including but not limited to: purchase orders, RFPs, licensing agreements, invoices, and contracts (including non-disclosure agreements) related to any facial-recognition product or service. The SPS does not use facial recognition technology.

**Request #2.** All records referencing facial recognition, including but not limited to emails, text messages, memoranda, and notes;

**Response #2.** The City is unable to respond to your request for all records referencing facial recognition, including but not limited to emails, text messages, memoranda, and notes at this time and requests that you consider narrowing the scope of this request.

Personnel in the SPS have advised that a response to this request would require searching the email accounts of 4800 plus SPS employees. Additionally, the SPS does not use facial recognition technology.

**Request #3.** All records referencing or describing privacy or other concerns about the use of a facial recognition system, including but not limited to emails, text messages, memoranda, and notes;

**Response #3.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for all records referencing or describing privacy or other concerns about the use of a facial recognition system, including but not limited to emails, text messages, memoranda, and notes. The SPS does not use facial recognition technology.

**Request #4.** Any internal policy referencing or pertaining to the use of face recognition technology or facial images;

**Response #4.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for any internal policy referencing or pertaining to the use of face recognition technology or facial images. The SPS does not use facial recognition technology.

**Request #5.** All communications between employees of the SPS and representatives of any private vendor or company offering or soliciting any facial-recognition product or service.

**Response #5.** The City is unable to respond to this request for all communications between employees of the SPS and representatives of any private vendor or company offering or soliciting any facial-recognition product or service and requests that you consider narrowing the scope of this request. Personnel in the SPS have advised that a response to this request would require searching the email accounts of 4800 plus SPS employees. Additionally, the SPS does not use facial recognition technology.

**Request #6.** Materials relating to how any facial-recognition product or service functions (or functions improperly), including e-mails, handouts, PowerPoint presentations, advertisements, or specification documents.

**Response #6.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for materials relating to how any facial-recognition product or service functions (or functions improperly), including e-mails, handouts, PowerPoint presentations, advertisements, or specification documents. The SPS does not use facial recognition technology.

**Request #7.** Manuals, policies, procedures, and practices governing the use or monitoring of a facial- recognition product or service or related information or databases. This request includes, but is not limited to:

- a. Procedures for using, deleting, or retaining photos of subjects to be identified;
- b. Materials identifying any sources of such photos, such as mobile devices, body cameras, surveillance videos, or identification photos;

**Response #7.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for Manuals, policies, procedures, and practices governing the use or monitoring of a facial- recognition product or service or related information or databases. This request includes, but is not limited to: a. Procedures for using, deleting, or retaining photos of subjects to be identified; and b. Materials identifying any sources of such photos, such as mobile devices, body cameras, surveillance videos, or identification photos. The SPS does not use facial



recognition technology.

**Request #8.** Training materials related to any facial-recognition product or service.

**Response #8.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for training materials related to any facial-recognition product or service. The SPS does not use facial recognition technology.

**Request #9.** Records relating to any mobile application related to any facial-recognition product or service.

**Response #9.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for records relating to any mobile application related to any facial-recognition product or service. The SPS does not use facial recognition technology.

**Request #10.** Records relating to any public process or debate about any facial-recognition product or service, including meeting agendas or minutes, public notices, analyses, or communications between the SPS and elected leaders or county or state officials, including but not limited to the Secretary of Education, members of the Board of the Department of Elementary and Secondary Education (DESE), and the Commissioner of DESE;

**Response #10.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for records relating to any public process or debate about any facial-recognition product or service, including meeting agendas or minutes, public notices, analyses, or communications between the SPS and elected leaders or county or state officials, including but not limited to the Secretary of Education, members of the Board of the Department of Elementary and Secondary Education (DESE), and the Commissioner of DESE. The SPS has not conducted any public processes and/or debates about facial recognition products and/or services. The SPS does not use facial recognition technology.

**Request #11.** All contracts or MOUs with local, state, and/or federal agencies referencing or pertaining to facial recognition technology;

**Response #12.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for all contracts or MOUs with local, state, and/or federal agencies referencing or pertaining to facial recognition technology. The SPS does not use facial recognition technology.

**Request #12.** All audits, annual reports, and other administrative reports referencing facial recognition technology or searches. This request includes but is not limited to all records containing or pertaining to: a. Statistics and other reports that reflect how facial recognitions tests worked; b. Statistics and other reports that reflect how frequently facial recognition is used; c. Statistics and other reports that show the evolution of facial recognition use over time; and d. Statistics and other reports that show the number of times the SPSs misidentified an individual using facial recognition;

**Response #12.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for all audits, annual reports, and other administrative reports referencing facial recognition technology or searches. This request includes but is not limited to all records containing or pertaining to: a. Statistics and other reports that reflect how facial recognitions tests worked; b. Statistics and other reports that reflect how frequently facial recognition is used; c. Statistics and other reports that show the

evolution of facial recognition use over time; and d. Statistics and other reports that show the number of times the SPS misidentified an individual using facial recognition . The SPS does not use facial recognition technology.

**Request #13.** All training materials, including but not limited to PowerPoint presentations, used to train staff in the use of face recognition tools or capabilities.

**Response #13.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for all training materials, including but not limited to PowerPoint presentations, used to train staff in the use of face recognition tools or capabilities. The SPS does not use facial recognition technology.

**Request 14.** Any document containing any SPS legal analysis or justification for any use of face recognition technology.

**Response #14.** Personnel in the SPS have advised this office that there are no records that are responsive to your request for any document containing any SPS legal analysis or justification for any use of face recognition technology . The SPS does not use facial recognition technology.

Should you be aggrieved by this response, you may appeal to the Supervisor of Public Records in the Massachusetts Secretary of State's Office pursuant to 950 CMR 32.00 and G.L.c. 66, §10(b).

Please reference public records request #R001404-090319 in all communications regarding this request.

Sincerely,



Andrea L. Stone  
Public Records Coordinator