Executive Office of Public Safety and Security



Legislative Report on the Live Firearm Training Component of the Basic Firearms Safety Certificate Requirement

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Section 1: Executive Summary

Background and Context:

Chapter 135 of the Acts of 2024 "An Act Modernizing Firearm Laws in the Commonwealth," ("Act") was signed into law by Governor Maura Healey on July 25, 2024, representing significant gun safety legislation. The Legislature passed the bill in response to the Supreme Court's decision in New York State Rifle & Pistol Association v. Bruen, which limits states' authority to enact gun safety measures. This law updates Massachusetts' firearms laws by tackling concerns like untraceable "ghost guns" and 3-D printed firearms, strengthening the "Red Flag Law," and improving public safety by requiring that firearms safety courses include live fire training as part of their curriculum.

With respect to this Report, the Act requires:

"SECTION 152. Notwithstanding any general or special law, rule or regulation to the contrary, the secretary of public safety and security or a designee shall study and report to the legislature on recommendations to ensure the effective implementation of live firearm training as required pursuant to section 131P of chapter 140 of the General Laws. Said report shall include, but not be limited to, any recommendations to ensure that such training does not become cost prohibitive and that resources and facilities to conduct such training are adequate and reasonably available to individuals in all regions of the state. Prior to issuing such report and recommendations, the secretary, or designee, shall conduct not less than 2 public hearings in different regions of the state to solicit public input regarding the implementation of the live firearm training requirement. The report and any recommendations shall be filed with the clerk of the house of representatives, the clerk of the senate, the senate and house chairs of the joint committee on the judiciary and the senate and house chairs of the joint committee on public safety not later than 9 months from the effective date of this act."

The Executive Office of Public Safety and Security (EOPSS) held two public hearings on May 29, 2025, and June 4, 2025, after providing notice to interested stakeholders, including by publishing notice in the Boston Herald. Both hearings were held remotely to allow as many members of the public from all regions of Massachusetts to participate as possible. In total, approximately 170 people participated in the hearings and 58 comments were offered by 37 speakers. EOPSS received approximately 42 written comments during the public comment period, which was open for more than 3 weeks.

In addition to reviewing the information shared with EOPSS via the hearings and written submissions, this report also highlights research from other states with live firearm protocols, key considerations, and suggested recommendations that support effective live firearm training as part of the basic firearm safety certificate requirement.

Key Findings:

Findings outlined in this report will be carefully considered as part of the implementation process underway for live firearm training, which is statutorily required to be in effect April 2026.

The key considerations identified within this report include:

- Cost: There are potential cost implications that must be considered for successful enactment of the live fire requirement contained in Section 74 of the Act. Some potential costs include the cost of conducting firearms classes (e.g., supplying firearms and equipment), range insurance, travel expenses, range maintenance costs, etc.
- Accessibility: There are currently no state-run ranges, requiring
 Massachusetts to rely on non-state-run ranges (or, potentially, ranges
 currently not accessible to the public), to provide the infrastructure to
 support the live fire training requirement. This will present challenges for
 both instructors, who will need to access ranges to teach firearms
 courses, and for ranges concerned about potential maintenance costs,
 insurance costs, capacity, and environmental impacts of opening their
 doors to accommodate the required live fire trainings. Additionally,
 license applicants have expressed concerns about being able to get to
 ranges.

With approximately a year before the enactment of the live fire training requirement, EOPSS intends to continue to engage key stakeholders – including ranges, certified instructors, and licensees – to fully understand resource availability, constraints, and potential impacts so that the live fire may be reasonably and practically implemented.

In addition to the key findings, the report also highlights several potential recommendations that emerged through research and public feedback. These recommendations include:

- Developing minimum standards for the live fire training requirement to clarify teaching goals.
- Engaging with relevant stakeholders, including ranges, certified instructors, and organizations, to help ensure successful implementation

- of live fire by discussing solutions that will ensure the requirement is accessible and affordable.
- Continuing public engagement to ensure the public is aware of changes and is provided the necessary information for a smooth implementation.
- Engaging with other states to understand potential implementation barriers.
- Being cost conscious by exploring creative opportunities (e.g., state subsidies, grants, fee structures, partnerships, incentives, etc.) to attempt to ameliorate the chance of cost burden on stakeholders (e.g., ranges, certified instructors, class participants).
- Ensuring resources and facilities to conduct live fire training are adequate and reasonably available to individuals in all regions of the state by continuing to understand the capacity and demand constraints and identifying opportunities to create balance. Examples include documenting and sharing information on ranges and certified instructors offering live fire training courses, identifying transportation options, and exploring methods for increasing capacity (e.g., incentives for ranges, building new ranges, using existing state facilities, etc.).

The recommendations outlined in this report are not intended to be exhaustive or final. EOPSS, in collaboration with the MSP, remains committed to ongoing engagement with necessary stakeholders for the successful implementation of the live fire training requirement and as such, the recommendations and approach are expected to evolve as discussions and feedback continue to take place.

Section 2: Research & Analysis

To ensure that the enactment of the live fire requirements are grounded in proven approaches, EOPSS examined other states and municipalities within the Commonwealth that already have live fire training requirements. This section also includes an analysis of the accessibility and potential cost associated with implementing the live fire requirement.

Section 2.1: States with live fire training requirements

More than a third of U.S. states require live fire training as part of their firearm permitting or licensing process. These states include: California, Connecticut, Delaware, Florida, Illinois, Louisiana, Maryland, Michigan, Minnesota, Nebraska, Nevada, New Jersey, New Mexico, North Carolina, Ohio, Rhode Island, and Texas.

Each state that mandates live fire training has its own specific requirements. For example, some states require live fire training only for specialty licenses, such as those for concealed carry. In addition, each state uses different naming conventions and permit structures for their licenses. As a result, it is not possible to make direct, one-to-one comparisons between states. Additionally, the challenges faced by other states may differ from those Massachusetts might encounter when implementing a similar requirement. Nonetheless, this information is helpful in providing a broad overview of live fire training requirements across the country.

Table 1: States with Live Fire training requirements¹

State	Permit type	Requirements	
California	Concealed Carry Weapons License	"For new license applicants, the course of training for issuance of a license[must] meet the following minimum criteria: - The course shall be no less than 16 hours in length - The course shall include live fire shooting exercises on a firing range and shall include a demonstration by the applicant of safe handling of, and shooting proficiency with, each firearm that the applicant is applying to be licensed to carry."	
Connecticut	State Permit to Carry Pistols or Revolvers	Live fire is required. "Computer- generated, dry-fire, simulated tools plastic bullets, air guns, etc. are not acceptable. Students must fire a semi-automatic pistol or revolver."	
Delaware	 License to carry a concealed deadly weapon 	Firearms training course must include "Live fire shooting exercises conducted on a range, including	

¹The table includes live fire training requirements, sourced from available state websites or publicly available state accredited documentation as of June 15, 2025. When possible, the language was copied directly from State documents and only modified for brevity. In some states, new laws passed removing the need for a permit for individuals legally allowed to possess a firearm (e.g., Texas, Florida and Ohio), however, permits are encouraged.

State	Permit type Requirements				
	2. Handgun qualified purchaser permit	the expenditure of a minimum of 100 rounds of ammunition." ⁱⁱⁱ			
Florida	Concealed Weapon or Firearm License	"Starting July 1, 2023, new legislation takes effect in the state of Florida which authorizes a person to carry a concealed weapon or firearm pursuant to a valid concealed weapons license or without a concealed weapons license provided that the criteria for obtaining a license is met." "Any approved firearms safety or training coursemust include live fire using a firearm and ammunition." Live fire must be conducted in the physical presence of an instructor."			
Illinois	Concealed Carry License (CCL)	Proof of completion of a firearms training course of at least 16 hours, including range time. Live fire exercise must consist of a minimum of 30 rounds: 10 rounds from 5 yards, 10 rounds from 7 yards, and 10 rounds from 10 yards at a B-27 silhouette target. Applicant must pass the live fire exercise with a concealable firearm. Students fail if they don't hit the target with 70% of rounds fired during the range portion. Applicants can get credit for prior training (up to 8 hours) or for those who are an active, retired, or honorably discharged member of the United States Armed Forces (8 hours) available, but remaining hours must cover laws and range qualification. vi			
Louisiana	Concealed Handgun Permit	"Louisiana is an open carry state allowing its lawfully eligible			

State	Permit type	Requirements
		residents to bear unconcealed firearms in public". Vii however, to obtain a Concealed Handgun Permit, actual live range fire and proper handgun cleaning procedures are required. Course must include two hours of actual live range fire. "Live range fire includes 12 rounds each at 6 feet, 10 feet, and 15 feet for a total of 36 rounds. Each applicant or permittee must perform at least one safe reload at each distance. Each applicant or permittee must score 100% hits within the silhouette portion of an NRA B-27 Type silhouette target with at least 36 rounds." Viii
Maryland	1. Wear and Carry Permit 2. Handgun Qualification License (HQL)	Wear and Carry Permit: Wear and Carry Permit training is 16 hours of instruction for an original application and 8 hours of instruction for a renewal application. All applicants must shoot a Basic Practical Handgun Course of at least 25 rounds, from no further than 15 yards and score at least 70% accuracy. Applicants will be required to upload a completed and signed MSP 29-14 Certified Qualification Score Sheet. HQL: Requires a component that requires the applicant demonstrate the ability to safely fire a handgun. Requires 4 hours of instruction. Orientation component that demonstrates the person's safe operation and handling of a firearm, to include a "live fire" component in which the applicant safely discharges the firearm. An applicant

State	Requirements			
		may not be required to fire in excess of 15 yards during qualifications. ^{ix x xi}		
Michigan	Concealed Pistol License (CPL)	Training course is at least 8 hours, including 5 hours of classroom and 3 hours of range firing. Applicant must pass the Michigan Commission on Law Enforcement Standards (MCOLES) Concealed Carry Weapon (CCW) basic pistol safety training assessment course of fire. Applicants are required to fire Five (5) rounds at a blank target (25½ inches long by 11 inches wide) from a distance of 4 yards. There is no time limit, the shooter's position is shooter's choice, and the starting position is "Ready Position." On the command to fire, the shooter aims at the target and fires until all 5 rounds have been fired. Scoring requires 100% (all five rounds) within the confines of the paper. Shooter must successfully complete two out of three attempts.xii xiii		
Minnesota	Permit to Carry	Department of Public Safety (DPS) "requires a total of at least 25 rounds at multiple distances for the live fire qualification" for both instructor and courses.xiv		
Nebraska	Concealed Handgun Permit	Range training will be live fire exercises conducted at a firing range. Qualification course is 30 rounds with varying distances. Target must be FBI "Q" target. Minimum score is 70 percent to demonstrate competency. Participants allowed three attempts. Example course: 6 rounds at 3 feet (two per command, one from concealed draw). **		
Nevada	Concealed Carry Permit (CCW)	CCW training must include live fire. xvi xvii It is also noted that instructor certification requires "qualifying		

State	Permit type	Requirements
		with a course of live fire established by the State of Nevada Private Investigators Licensing Board with a minimum passing score of 275 out of 300 on a full-size B27-type target." xviii
New Jersey	Concealed Carry	Training requires a range portion with a specified Course of fire. "Total of 50 rounds per participant[Use] FBI type Q target. [Distance is] 15 yards Double action is required for revolvers for all phases; Semiautomatics are to be fired in the manner in which the individual weapon functions normally and are to be decocked, if applicable, when changing positions or hands." Course involves drawing from concealed, firing 5 rounds, holstering; repeating twice (10 rounds total); reloading if required; clearing weapon. Participant must demonstrate proficient and safe reloading. "To achieve a passing score of 80%, the participant must place a minimum of 40 shots within the border of the Q target silhouette during the untimed course of fire. The participant must also demonstrate safe handling throughout, including safe loading, unloading, drawing, and reholstering." Prior courses must have included minimum 50 scored rounds xix
New Mexico	Concealed Handgun Carry License	Approved firearms training courses must include range instruction. "An applicant shall not be licensed unless he demonstrates, at a minimum, his ability to safely use a handgun of .32 caliberThe

State	Permit type Requirements		
		firearms training course shall be not less than fifteen hours in length." ××	
North Carolina	Concealed Handgun Permit Applicant must submit certifi attesting to successful compl and "competence with a hand Course description and outlin must be filed by instructor. ××i		
Ohio	Concealed-Handgun License (CHL)	"Permitless carry is legal in Ohio as of 2022. However, Ohioans seeking to carry concealed are encouraged to take the steps necessary to get an official concealed carry license." "The total time required for training is eight hours with a minimum of two hours of in-person training that consists of range time and live-fire training." Applicant must demonstrate knowledge, skills, and attitude necessary to shoot a handgun safely. Applicant must pass an examination including an "in-person physical demonstration of competency on handgun usage and safe handling/storage."	
Rhode Island	License to Carry	"No person shall be issued a license or permit to carry a pistol or revolver concealed upon his or her person until he or she [have] qualified with a pistol or revolver of a caliber equal to or larger than the one he or she intends to carry [That qualification is] to consist of firing a score of one hundred ninety-five (195) or better out of a possible score of three hundred (300) with thirty (30) consecutive rounds at a distance of twenty-five (25) yards on the army "L" target, firing "slow" fire. The "slow" fire course shall allow ten (10) minutes for the firing of each of three (3) ten (10) shot strings." xxiv xxv	

State	Permit type	Requirements
Texas	License to Carry (LTC)	"Note, as of 2021, Texas law no longer requires people to have a license to carry (LTC) in order to carry a handgun in most public places. However, Texans are still able to get a license to carry after the new law takes effect. People with a handgun license may be able to take their guns to some places where unlicensed people can't." xxvi To get a LTC, "applicant must demonstrate handgun proficiency (shooting) with a Qualified LTC Instructor" If online classroom training is taken, "applicant must attend 1-2 hours of range instruction class and demonstrate handgun proficiency (shooting) with a Qualified LTC Instructor." xxviii

Section 2.2: Municipalities within Massachusetts with live fire training requirements

While section 74 of the new firearms law mandates live firearm training as a component of the basic safety firearms curriculum across Massachusetts, this requirement is not entirely new to all parts of the state. Prior to and concurrently with this statewide mandate taking effect, several municipalities already required applicants to demonstrate competency through live fire training as part of their local licensing process or as a prerequisite for applying. The table below details the specific live fire requirements in these municipalities, including Boston, Weymouth, Quincy, Rockland, and Braintree.

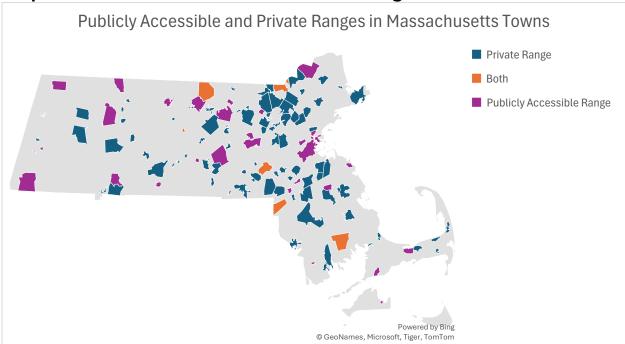
Table 2: Municipalities within Massachusetts with live fire requirements

Municipality	Permit type	Requirements
Boston	License to Carry and Renewals	"Must complete a live fire test We expect you to show safe handling of, and familiarity with, a .38 caliber, 4-inch barrel revolver"xxviii Before 2020, live fire tests occurred at the Boston Police Department's Firearms Range. However, in recent years, applicants are instructed to complete the live fire test at another range.
Braintree	First Time LTC or FID applicants	Must "complete an approved Basic Firearms Safety Course, 'live fire' certification."xxix
Weymouth	First time LTC or FID applicants	The required course (State Certified Massachusetts Hunter Safety and/or Massachusetts State Police Basic Firearms Safety course) "must have a live fire segment Applicant must have proof, such as a target dated and signed by the instructor with the instructor's ID number."xxx
Rockland	New or Renewal License to Carry Firearms or Firearms Identification Card (FID)	Applicants are "required to show proof of completing an approved Firearms Safety Course which must include a Live Fire Component or proof that you held a license prior to June 1, 1998."***
Quincy	All new applicants for an LTC or FID	"A Massachusetts Safety Course Certificate with Certified Live Fire is required for all new applicants, prior to applying for an LTC or FID."xxxii

Section 2.3: Analysis on the Availability and Accessibility of Training Resources

According to wheretoshoot.org, which can be found on Mass.gov under the page "Shooting Ranges with Public Access," **xxiii* there are currently approximately 39 shooting ranges accessible to the public ("publicly accessible ranges") or non-members throughout Massachusetts. There are also 99 private, member-driven, shooting ranges in Massachusetts.**

The graph below highlights towns in which there is a publicly accessible range or private range (or, in some cases, both a publicly accessible range and a private range).



Graph 1: Towns in Massachusetts that have ranges

According to the Firearms Records Bureau data posted to Mass.gov, there is an average of approximately 43,000 new applications for firearms licenses per year. Note, this data includes Licenses to Carry and Firearms Identification Cards. Approximately 1-2% of the applications are for other license types, such as License to Sell Ammunition. The average was derived from the number of applicants over the past 3 years, specifically **2024**: 56,231 new applicants, **2023**: 37,740 new applicants, **2022**: 35,216 new applicants.**

The number of **new** applicants (rather than renewal applicants) was used in this section given that a person who has been issued a firearms identification card or license to carry on or before August 1, 2024, will not be required to complete the live fire component, including when seeking to renew the card or license. For the purposes of this report, impact on demand was determined by the number of publicly accessible ranges.

Year	2024	2023	2022
New applications (annual)	56,231	37,740	35,216
New applications (monthly)	4,686	3,145	2,935
Applicants per range per month (assuming 39 publicly accessible ranges)	120	81	71
Applicants per range per week (assuming 39 publicly accessible ranges)	30	20	19

It is estimated that publicly accessible ranges could have to train 20-30 applicants per week, per range to meet the potential demand. The current demand of applicants per month, per range is not known. The demand on accessibility is expected to be reduced with the inclusion of private ranges.

Section 2.4: Cost Analysis

In assessing the overall cost of participating in activities offered by shooting ranges, a significant financial factor to consider is the cost of training. While new live fire certification requirements are not finalized and updated courses are not yet approved by MSP, this report is using research from both Massachusetts classes that do and do not incorporate live fire into the curriculum. A small subset of courses from across Massachusetts were used in the research. Generally, training that involves a live fire component is higher in cost compared to classes without live fire.

Classes without a live fire component ranged in cost from \$80 to \$150. Classes with a live fire component ranged from \$120 to \$199.

Beyond the direct cost of training classes, several other financial considerations are relevant to the overall expense of engaging with ranges. Additional cost considerations are highlighted in the stakeholder group in Section 4: Key Considerations section of this report.

Section 3: Public Feedback

Public hearings regarding the implementation of the live firearm training requirement took place on May 29, 2025, from 1:00 pm to 3:00 pm EST and June 4, 2025, from 10:00 am to 12:00 pm EST. Meeting minutes are published on the EOPSS website found here: https://www.mass.gov/orgs/executive-office-of-public-safety-and-security.

As previously discussed, the public hearings attracted approximately 170 participants yielding approximately 100 public comments. Attendees included

representatives from gun owner organizations and ranges, as well as certified instructors, law enforcement officers, and individuals with firearm licenses or seeking licensure.

This section summarizes recurring themes and concerns raised during the public hearings and from written submission feedback.

- Most commentors agree with the concept of live fire training, but do not believe it should be mandatory: Most commentors opened their remarks saying they agreed with the concept of live fire training and are generally supportive of a high level of training, especially for new gun owners. However, many commentors believed that completing a course with live fire requirement should be voluntary and not mandated by the Commonwealth.
- Lack of Clarity on State Standards Regarding Live Fire Requirement:
 A primary concern was the lack of specific information from the Commonwealth (the MSP) regarding what the mandated training will entail. Questions were raised about whether the training would cover only handguns or multiple types of firearms (handgun, rifle, shotgun). Attendees were concerned about a lack of clarity on what constitutes a minimum acceptable standard, what the passing requirements will be, if any, and how instructors will be assessed or recertified to assure capability with modern education.

There was debate among public participants about whether the training should focus on basic safety or require demonstration of shooting proficiency. Some instructors argued that the decision on what firearm and whether to require live fire should be up to the instructor, recommending the option to select a lower caliber appropriate to the student's ability and intended use. It was noted that a short 4-hour class is unlikely to make someone a "good" shooter but can focus on safety.

Many had questions about timing and if those who have taken a course with live fire would be grandfathered into the requirement.

Availability and Access: Attendees stressed the significant challenges
posed by the limited number of publicly accessible ranges, noting that
most ranges in the Commonwealth are private, members-only, ranges.
Many attendees noted that there are no state-run public ranges in
Massachusetts.

Concerns were raised about how applicants who do not belong to a private range or cannot afford membership will be able to access a range to complete the required training.

Many raised concerns about access, cost, and ability to pass a live fire certification on behalf of the growing demographic of underrepresented gun owners, especially women, racial minorities, elderly, and people with disabilities.

There is uncertainty about whether some ranges will be willing or able to open their doors to applicants seeking training without that impacting their members' use. The process for instructors to partner with ranges to offer these courses is currently unclear, and some ranges are hesitant to let individual certified instructors use their facilities to teach classes. Ranges cited concerns including: a) increased maintenance and insurance costs; b) needing to dedicate a lane for classes, thus decreasing available range space for other shooters; and c) lead and environmental concerns.

Instructor participants noted that the safest practice is to have one instructor for each trainee and noted that this will limit the number of attendees per available class, cause delays, and make classes more expensive.

It was suggested that the Commonwealth could explore using simulators in place of live fire, with the intention of increasing accessibility for those with limited access to ranges. There was discussion about the cost of this solution and the likeness to open fire at a range.

Some suggested that the state could provide classroom space to teach training courses. Others brought up that the state could explore the use of other existing facilities not currently made available to the public.

• Cost and Affordability of Training: The potential cost burden associated with the live firearm requirement was a significant concern, with fears that it could price people out of gun ownership. Speakers noted that classes, especially those including live fire, can be expensive due to instructor time, the cost of ammunition, and instructors potentially needing to supply firearms and essential equipment such as eye and ear protection now that training is mandated. Insurance expenses for ranges and instructors could become a prohibitive issue, causing ranges to refuse to host live fire trainings or forcing private instructors to close their

businesses. Participants raised the possibility of the state indemnifying the ranges to help reduce insurance costs.

- **Instructor Preparedness and Liability:** Instructors also expressed concerns about potential liability and danger involved with teaching beginners.
- Logistical and Practical Challenges: The challenge of how participants can practice before they have obtained a license to possess firearms was mentioned several times, especially in relation to the concern of needing to pass a shooting test to obtain a license.
- Constitutionality and Process: Many raised concerns with the
 constitutionality of this requirement and wished public hearings had
 been conducted before the legal requirement was put in place. Many did
 not understand the problem that the live fire requirement is solving,
 stating that a very small portion of gun-related deaths and injuries are
 accidents in Massachusetts.

The two Public Hearings revealed concern among stakeholders regarding the practical implementation, cost, availability, and specific requirements of the new live firearm training mandate, emphasizing the need for clear standards, increased range access, and continued dialogue with affected parties.

Section 4: Key Considerations

Based on research and feedback gathered from the public hearings, several key challenges and considerations emerged that warrant further discussion and careful consideration as live fire is implemented. Key considerations are grouped by the four main stakeholder groups that will be impacted by the new requirement. These stakeholder groups include:

- 1) Certified Instructors ("instructors")
- 2) Massachusetts State Police ("MSP")
- 3) Firearms Safety Class Participants ("class participants")
- 4) Shooting Ranges ("ranges")

Organizing the key considerations and concerns by stakeholder group highlights the specific needs and challenges of each group, providing a more focused and holistic delivery approach and ensures that all relevant perspectives are considered during the implementation process.

Section 4.1: Certified Instructors

Certified Instructors are certified by the MSP to teach a basic safety firearms course to individuals seeking to obtain a firearms license or permit. While there are approximately 3,000 individuals currently certified as instructors in the Commonwealth today, it is noted that not all of them may be actively teaching.xxxvi The following considerations apply to instructors:

• **Time and availability:** Courses will need to be resubmitted to ensure that the course covers the curriculum requirements, including live fire. While this process is underway, the availability of active certified instructors who can teach approved courses may be limited, potentially impacting how many instructors will be available to provide the training by April 2026 as required by the Act.

Individual instructors may need to establish relationships with ranges to be able to offer courses that include the live fire component. How instructors will collaborate with ranges to offer these courses needs to be defined. It is essential that there is cohesive collaboration between individual instructors and ranges to prevent the possible reduction of instructors available to teach the live fire course.

• Cost: Most individuals who will be required to take the live fire training do not currently have access or permission to own a firearm within the Commonwealth. As a result, instructors may be required to supply equipment necessary for the training, such as firearms, ammunition, targets, goggles and safety equipment, and other materials. The cost of providing these materials can impact the cost to teach the course, as instructors may need to source these materials for use.

Section 4.2: Massachusetts State Police (MSP)

The implementation of the live firearm training requirement places specific responsibilities on the MSP. For example, as previously stated, there are approximately 26 approved Basic Safety Firearms Courses. XXXVIII Courses will need to be re-evaluated by the Massachusetts State Police. The following considerations apply to MSP:

• **Time and availability:** The MSP will bear the primary responsibility for certifying updated safety course curriculum, which must now include

live fire training. This involves clarifying the standards to be used in all mandated safety courses.

Section 4.3: Firearms Safety Class Participants

Starting April 2026, new and renewing applicants are required to complete a basic firearms safety course that includes live firearm training. As noted in Section 2: Research & Analysis, it can be inferred that publicly accessible ranges could have to train ~20 - 30 applicants per week, per range to meet the potential demand. Section 5: Recommendations suggests that EOPSS and MSP continue to conduct research with ranges to determine how much of a shift in demand this represents. The following considerations apply to Class Participants:

- Time and availability: At least a portion of firearms training class must now be conducted at a shooting range. This means participants will have to travel to a range location, which could be further than current local course certification classrooms. This could impact accessibility, particularly in areas with limited publicly accessible range availability. Courses incorporating live fire training may be longer in duration on average than classes that do not contain live fire. In addition, range capacity limitations may restrict the number of participants allowed in a single class. This could result in fewer classes being taught annually or longer waiting times for applicants to fulfill the training requirement.
- **Cost:** The inclusion of live fire training and potentially increased overhead for instructors and ranges may lead to classes being more expensive than previous safety courses.

Section 4.4: Shooting Ranges

Shooting ranges are essential facilities for fulfilling the live firearm training requirement. As noted in Section 2: Research & Analysis, wheretoshoot.org shows that there are at least 138 shooting ranges within the Commonwealth. The following considerations apply to ranges:

• **Time and availability:** Bringing a large number of students to ranges for training may lead to increased crowding at these facilities. Increased demand for training could impact the availability of range time for existing members or individuals who wish to use the range for sport or

recreational shooting. Increased demand could also impact noise levels, lead levels, and other environmental factors at ranges.

• **Cost:** Increased usage and crowding could potentially lead to higher maintenance and / or insurance costs for the ranges.

Section 5: Recommendations

This section of the report outlines recommendations to ensure the effective implementation of the live firearm training requirement. Guided by the principle of balancing public safety and proper instruction without overburdening impacted stakeholders, these recommendations aim to address concerns regarding the availability and cost-prohibitive nature of the required training, as stipulated in Section 152 of the Act.

It is important to note that, pursuant to the Act, this report is being submitted to the legislature well before the requirements for the live fire program are completed. This provides time for additional consideration and planning of these recommendations. The live fire requirement takes effect 18 months after the effective date of the Act, which is approximately April 2, 2026.

Based on the key considerations identified and findings from the public hearings, the following recommendations are proposed:

- Develop minimum standards for the live fire training requirement to clarify teaching goals: It will be critical to recertify the courses firearms instructors teach, as well as any new courses, and determine the standards for the live fire component of the courses (e.g., if there is a standard for caliber, rounds of ammunition, etc.). Clear minimum standards should be developed in a dynamic way, leveraging examples from other states and from municipalities within the Commonwealth, and active engagement of key stakeholders.
- Continue robust Massachusetts stakeholder engagement, especially
 with ranges and instructors, to work toward making adequate
 facilities and classes available throughout the Commonwealth: It will
 be important to continue and deepen engagement with instructors and
 leadership at ranges through conversations and/or a survey. Engaging
 ranges and instructors on key considerations like capacity, potential

challenges (e.g., crowding, maintenance, insurance, impact on ranges' sport use), and willingness to host trainings will be critical for ensuring adequate facilities are available statewide. It will also be critical to continue engaging all other public stakeholders to ensure they understand expectations, timelines, options, and progress.

- Engage other states to understand potential implementation barriers: Other states (e.g., those listed in the Research & Analysis section of this document) can help the Commonwealth to understand cost, access, and other implementation barriers and successes, as well as lessons learned.
- Be cost conscious to mitigate potential cost-impact on ranges, instructors, and participants: There are opportunities to explore creative solutions (e.g., state subsidies, grants, fee structures, partnerships, incentives, etc.) to attempt to ameliorate the chance of cost burden from the list below of likely additional costs on three main stakeholder groups:
 - Certified Instructors:
 - Equipment costs like firearms, ammunition, targets, ear plugs, and goggles
 - o Instructor and course recertification costs
 - Firearms Safety Class Participants Travel to ranges:
 - Potential increase to class fees
 - Shooting Ranges:
 - o Increased maintenance costs
 - o Increased insurance costs
 - Opportunity cost of using range space for training rather than sporting or other member activities
- Ensure resources and facilities to conduct live fire training are adequate and reasonably available to individuals in all regions of the state:
 - Validate Capacity: continue to validate the potential capacity issue laid out in this report based on number of applicants expected in 2025 and 2026, instructors intending to get certified to teach live fire courses, ranges anticipated to make space available for live fire courses, etc.

- Share Information on Certified Instructors: establish a documented list of ranges that are willing to work with certified instructors.
- Course Availability: consider strategies to maximize the availability of training slots, perhaps by encouraging ranges to dedicate specific times to training or exploring flexible scheduling models.
- *Transportation options*: explore facilitating transport options for individuals to get to ranges for the live fire portion of their training.
- Explore alternative methods for meeting the live fire requirement: in places where it is found that appropriate range availability does not exist, the Commonwealth could consider alternative options, like using simulators, which could bolster access, even in a temporary fashion.
- Explore opportunities to increase capacity: investigate potential models or incentives that encourage private ranges to make their facilities available for certified instructors to conduct the required training. Alternatively, explore opportunities to add to the range capacity by building ranges or by using other existing facilities for the live fire requirement.
- Explore opportunities to manage demand: explore strategies to manage the volume of students requiring a live fire training, such as a rolling requirement or an extended period in which the live fire requirement can be completed.

Recommendations conclusion: These recommendations are meant to allow the Commonwealth to work towards balancing the critical goal of enhancing public safety through comprehensive firearm training, including live fire, with the practical needs and potential burdens on all stakeholders involved in the licensing process. The timeframe provided by the delayed effective date of the live fire requirement should help to achieve these goals through continued collaboration with stakeholders.

Section 6: Conclusion

This report addresses the mandate from Section 152 of Chapter 135 of the Acts of 2024, requiring a study and recommendations for the effective implementation of live firearm training.

The report includes research & analysis, identifies key considerations, and incorporates public feedback. Key findings indicate that other jurisdictions require live fire training and its implementation in Massachusetts will require similar careful consideration. These include maintaining awareness as to range capacity, monitoring cost increases for both instructors and participants, and publicizing clear and understandable state standards for training courses. Public feedback strongly echoed these matters, emphasizing the importance of well-defined guidance, accessibility, affordability, and engagement with interested stakeholders.

The report provides specific recommendations aimed at addressing these challenges. These steps are designed to support the successful integration of the live fire training requirement while balancing public safety goals with practical implementation considerations.

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