



NEW YORK CITY COMPTROLLER **BRAD LANDER**

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Audit on the Timeliness of Civilian Complaint Review Board's Investigations and New York City Police Department's Implementation of the Board's Recommendations

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THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BRAD LANDER

December 30, 2025

To the Residents of the City of New York,

My office has audited the Civilian Complaint Review Board (CCRB) to determine whether it investigates police misconduct complaints in a timely manner, and the New York City Police Department (NYPD) to assess its implementation rate of CCRB's recommendations.

The audit found that CCRB met its average timeframe targets to complete investigations but more than half of its full investigations were prolonged. As a result, during most of the period under review (January 2024 through May 2025), NYPD determined that CCRB submitted the completed substantiated investigation reports too close to the expiration of the statute of limitations for the department to consider them. This resulted in NYPD closing 51.5% of substantiated non-charges cases without any review and without disciplinary action.

In addition, the audit found that, while NYPD accepted CCRB recommendations and served charges in 86.3% of the most serious misconduct cases, the department did not implement CCRB's discipline recommendations in more than 50% of substantiated non-charges cases. The audit also found that the implementation rates varied significantly depending on the Police Commissioner. Finally, the audit found that NYPD did not consistently report disciplinary actions and penalties to CCRB.

The audit makes four joint recommendations to CCRB and NYPD, three recommendations to CCRB, and seven recommendations to NYPD. CCRB and NYPD stated that the agencies would work together to address the report's recommendations. The audit also makes two recommendations to the authorities responsible for appointing Board Members and two recommendations to the City. The Mayor's Office did not provide a response to these recommendations.

The results of the audit have been discussed with CCRB and NYPD officials, and their comments have been considered in preparing this report. The agencies' complete written responses are attached to this report.

If you have any questions concerning this report, please email my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

Brad Lander
New York City Comptroller

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Audit Impact

Summary of Findings

The audit found that the Civilian Complaint Review Board (CCRB, or the board) met its targets for average timeframes to complete investigations but more than half of its full investigations took prolonged periods. As a result, during most of the period under review (January 2024 through May 2025), the New York City Police Department (NYPD, or the department) determined that CCRB submitted the completed substantiated investigation reports to NYPD too close to the expiration of the statute of limitations for NYPD to consider them. This, in turn, resulted in NYPD closing 51.5% of the substantiated cases without any review and without disciplinary action.

In addition, the audit found that, while NYPD accepted CCRB recommendations and served charges in 86.3% of the most serious misconduct cases (“charges cases”), the department did not implement CCRB’s discipline recommendations in more than 50% of substantiated “non-charges cases.” The audit also found that NYPD’s implementation rates varied significantly depending on the Police Commissioner—Police Commissioner Jessica Tisch accepted and imposed the same level of discipline recommended by the board in 77.8% of substantiated cases, while Police Commissioner Edward Caban only imposed the same level of discipline in 22.9% of substantiated cases.

Finally, the audit found that NYPD did not consistently report disciplinary actions and penalties imposed against MOS for cases that CCRB submitted to the department.

Intended Benefits

This audit makes recommendations to improve the timeliness of CCRB investigations, codify agreed-upon timeframes for conducting investigations and producing evidence, and improve the tracking and reporting of disciplinary action. The report’s recommendations will help CCRB and NYPD achieve their mutual goals of consistent and fair discipline recommendations, foster accountability, and strengthen public trust.

Introduction

Background

Civilian Complaint Review Board Responsibilities and Composition

In 1953, NYPD established CCRB as an internal committee made up of police officers who investigated allegations of police misconduct, with Deputy Commissioners within the department deciding whether or not to recommend discipline. This early form of CCRB lacked civilian representation. In 1993, CCRB was made independent of NYPD and was granted subpoena power and authority to recommend discipline in cases that the board substantiated.

CCRB is empowered to receive, investigate, hear, make findings, and recommend disciplinary action for complaints initiated against NYPD uniformed members of service (MOS).¹ The board must consist of 15 members of the public who are appointed as follows:

- Five members appointed by the Mayor;
- Five members appointed by the City Council (one from each of the five boroughs);
- Three members designated by the Police Commissioner and appointed by the Mayor;
- One member by the Public Advocate; and
- One member appointed by the Mayor and the City Council Speaker, who serves as the Board Chair.

Board Members are appointed for three-year terms and serve until a successor is appointed. In the event of a vacancy, a successor must be chosen within 60 days to serve the remainder of the unexpired term. If the Board Chair position is vacant, the Mayor selects a Board Member to serve as interim Chair until the vacancy has been filled.

The City Charter requires the board to employ civilian investigators and establish rules of procedure for conducting investigations and making recommendations.

¹ Under the New York City Charter, CCRB is authorized to investigate complaints “concerning misconduct by officers of the [New York City Police] [D]epartment.” According to CCRB, the board’s jurisdiction extends to officers of all ranks who are members of NYPD. CCRB does not have jurisdiction to investigate complaints made against members of other law enforcement agencies that operate within the confines of New York City. CCRB also lacks jurisdiction to investigate complaints made against civilian employees of NYPD, e.g., Traffic Enforcement Agents, School Safety Agents, and Principal Administrative Aides.

CCRB Complaint Investigation Process

The CCRB complaint process consists of multiple stages, as detailed below.

Complaint Intake and Assignment

Complaints may be made by the public, the board, NYPD's Internal Affairs Bureau (IAB), or other government offices. Such complaints must fall within CCRB's jurisdiction and include misconduct allegations involving the following five categories:

- **Force** – when MOS use excessive or inappropriate force against a victim.
- **Abuse of Authority** – covers a broad category of acts in which MOS misuse their police powers, including racial profiling and bias-based policing, sexual misconduct, threats of improper actions, improper searches and seizures, refusal to process complaints, failure to abide by the Right to Know Act, and improper arrests.
- **Discourtesy** – when MOS engage in inappropriate behavioral or verbal conduct with a victim, including general profanity and the use of rude or obscene gestures.
- **Offensive language** – when MOS use slurs, making derogatory remarks or gestures relating to a protected category such as race, ethnicity, gender, religion, sexual orientation, or disability.
- **Untruthful statements** – when MOS make statements during the course of a CCRB investigation that are shown to be untruthful.

CCRB refers complaints that do not fall within its jurisdiction to other appropriate agencies.

Complaints of police misconduct can be submitted to CCRB in person or via telephone, mail, email, the CCRB website, or the City's 311 system. CCRB's Intake Unit receives complaints and logs them in the Complaint Tracking System (CTS). Complaints are then assigned to investigative squads within CCRB's Investigations Unit to determine whether alleged misconduct occurred and whether CCRB can conduct a full investigation.

A single complaint may contain multiple allegations filed against one or more MOS. CCRB investigates all allegations associated with an individual complaint as part of one CCRB case.

Full Investigation

CCRB can issue discipline recommendations only when it is able to conduct a full investigation by obtaining sufficient credible evidence. During an investigation, CCRB investigators review each misconduct allegation associated with the complaints assigned to them. CCRB investigators collect documentary and video evidence, which includes NYPD roll calls, command logs, vehicle assignments, stop-and-frisk forms, and body-worn camera footage, among other things. Investigators also interview complainants, victims, civilian witnesses, and NYPD MOS, including

the subject(s) of the misconduct complaint and any other NYPD officers who may have witnessed the incident.

At the end of a full investigation, CCRB investigators determine whether each allegation in a complaint is “substantiated” or “not substantiated.”² As detailed in Appendix II, CCRB classifies “Officer(s) Unidentified,” “Unable to Determine,” “Unfounded,” and “Within NYPD Guidelines” investigations as “not substantiated.” If at least one allegation in a complaint is substantiated, the entire complaint is considered “substantiated” regardless of whether there are other allegations in the complaints that were not substantiated.

After CCRB investigators complete a full investigation, they draft a Board Recommendation Report, also known as a Closing Report. The Closing Report includes the investigation analysis and recommended disposition for each allegation made against a single MOS related to the complaint.

CCRB investigators submit the entire complaint case file, along with the Closing Report, to the Case Management Unit (CMU) for processing and assigning the complaint for board review.

Board Review

The board is responsible for reviewing and evaluating all completed investigations to make findings and recommendations and vote on each allegation contained in a complaint. The City Charter allows CCRB to establish panels to supervise investigations and hear, make findings, and recommend action on such matters. Panels must be comprised of at least three Board Members and cannot be comprised exclusively of members appointed by the Mayor or City Council, or exclusively of members designated by the Police Commissioner and appointed by the Mayor.

Further, the Rules of the City of New York state that CCRB panel membership will be determined by the Board Chair and that each panel will be comprised of at least one member appointed by the Mayor, one member appointed by the City Council, and one member designated by the Police Commissioner and appointed by the Mayor, unless such composition interferes with or unreasonably delays the board’s operations. The Rules also state that panel membership must be rotated on a regular basis.

CCRB convenes panels once a month to review and vote on each allegation within substantiated and not substantiated complaints.³ The Board Members assigned to the panels receive access to investigation case files and Closing Reports for substantiated and not substantiated complaints assigned to them one month in advance of their scheduled Board Review Panel meeting. Once

² In cases where the complainant decides to withdraw their complaint, or the investigators are not able to identify the victim, or the MOS that was the subject of the complaint or find the complainant, or the victim refuses to be cooperative or are unavailable, CCRB investigators cannot proceed with a full investigation and close or truncate it.

³ In addition to the Board Review Panels, the CCRB holds Non-Board Panels that review truncated investigations.

the Board Members receive access, they review the complaints and can pre-vote on allegation dispositions in CTS. When the Board Review Panel meets on a scheduled date, the members review all complaint case materials together with the other members, make findings and cast their final votes on the disposition of each complaint allegation (substantiated or not substantiated). A unanimous or a two-to-one vote by the Board Review Panel results in final dispositions for a single MOS. The panel then determines the discipline recommendation for substantiated allegations utilizing NYPD's Disciplinary Matrix.

Disciplinary Matrix

In January 2021, NYPD established Disciplinary System Penalty Guidelines (the Disciplinary Matrix) which set forth an advisory schedule of penalties for violations of department policy and misconduct. In February 2021, CCRB and NYPD entered into a Memorandum of Understanding (MOU) with the goal of achieving consistent and fair discipline recommendations. The parties agreed that when the CCRB substantiates a complaint against an MOS, the board would use the penalty guidelines set forth in the Disciplinary Matrix as the framework for its recommendations and would only deviate from those recommendations under extraordinary circumstances. All disciplinary matters must be evaluated on a case-by-case basis, using the Disciplinary Matrix as a guide and considering mitigating and aggravating factors, the MOS' CCRB history, and NYPD employment history, among other things.

CCRB officials stated that the board incorporated the Disciplinary Matrix guidelines into CTS to facilitate the Board Review Panels' automated voting process. The Disciplinary Matrix guidelines embedded in CTS allow Board Members to assign a penalty day value to each substantiated allegation and then sum penalty day values of all the substantiated allegations against one MOS to arrive at an overall penalty day value for that MOS. The penalty day value is the number of forfeited vacation or suspension-without-pay days (or a combination of both) imposed on the subject MOS based on the severity of the misconduct.

Based on the overall penalty day value, the Board Members make a discipline recommendation that falls into one of several possible categories: Instruction/Formalized Training, Command Discipline A or B, or Charges and Specifications, as shown below in Table 1.⁴

⁴ Discipline is defined as actions designed to remediate inappropriate behavior, and imposed in a variety of ways, largely determined by the seriousness of the substantiated misconduct.

Table 1: NYPD’s Disciplinary Matrix Penalty Values

Penalty Day Value	Disciplinary Recommendation
Not applicable ⁵	Instruction/Formalized Training
From oral admonishment up to 5 days	Command Discipline A
Up to 10 days	Command Discipline B
Training to MOS termination	Charges and Specifications

Instruction or Formalized Training are recommended for the least serious procedural violations, while Charges and Specifications are recommended for more serious violations and may result in probation, termination, or other consequences.

Case Resolution, Trials, and Disciplinary Action

After CCRB votes to substantiate allegations and issues discipline recommendations, cases are submitted to NYPD and are resolved in several ways, depending on whether charges are recommended by CCRB.

Non-Charges Cases

If CCRB recommends Instructions, Formalized Training, Command Discipline A, or Command Discipline B (i.e., what CCRB and NYPD refer to as “non-charges cases”), the board submits its discipline recommendation and findings regarding each complaint allegation along with case files to NYPD’s Department Advocate’s Office (DAO). DAO, a unit within NYPD, reviews and adjudicates substantiated civilian complaints investigated by CCRB.

DAO does not conduct its own investigations and bases its discipline recommendations on its review of the information and documentation provided by CCRB, applicable laws and the Departmental rules. Once DAO completes its review of CCRB’s substantiated complaints, it generally forwards the complaints to the First Deputy Commissioner’s Office.⁶

The First Deputy Commissioner’s Office reviews the complaints and makes its recommendations on disciplinary action, then forwards them to the Police Commissioner’s Office for final determination.

⁵ According to NYPD’s Disciplinary Matrix, low-level violations may result in instructions or re-training through which a commanding officer instructs MOS on proper procedures. Low-level violations do not warrant a penalty such as loss of vacation days.

⁶ NYPD officials stated that when DAO agrees with CCRB’s recommendation for Command A discipline, DAO may “fast track” cases and does not send them to the First Deputy Commissioner or Police Commissioner for review.

Charges Cases

If CCRB recommends that Charges and Specifications (i.e., what CCRB and NYPD refer to as “charge cases”) be served upon the MOS, the board sends the case to its Administrative Prosecution Unit (APU) for prosecution. APU drafts Charges and Specifications and files them with DAO, the Office responsible for serving MOS with charges.

According to a Memorandum of Understanding between CCRB and NYPD, in limited circumstances, such as when MOS has no prior NYPD disciplinary history or prior substantiated CCRB complaints, the Police Commissioner may retain jurisdiction over a case.⁷ Cases retained by the Police Commissioner are handled by DAO; DAO may decide to pursue charges, impose lesser discipline, or take no disciplinary action at all, or some combination of these options. For cases not retained by the Police Commissioner, APU handles the prosecution by either entering into a plea agreement with the member of service or presenting evidence at an Administrative trial before an NYPD trial commissioner, who then recommends a guilty or not guilty verdict for each allegation.⁸

According to Section 75 of the New York Civil Service Law, disciplinary action must be commenced (i.e., service of Charges and Specifications, adjudication of a Command Discipline or Formalized Training) within 18 months of the date of occurrence of the misconduct.

Police Commissioner’s Approval

Although CCRB recommends the discipline that it deems appropriate, the Police Commissioner has final approval of any disciplinary recommendation and the authority to impose discipline. The Police Commissioner can accept, reject, or modify any discipline recommendation made by CCRB. In addition, the Police Commissioner may accept, reject, or modify any plea agreement or trial verdict.

Recordkeeping, Tracking, and Voting

CCRB utilizes an in-house recordkeeping system called CTS to record and track the entire cycle of a civilian complaint from its intake to the board’s final voting and Police Commissioner’s final discipline recommendation. CTS contains information regarding all complainants, alleged victims, and witnesses in both open and closed cases. The system houses CCRB complaint investigation

⁷ Memorandum of Understanding between CCRB and NYPD Concerning the Processing of Substantiated Complaints, dated April 2, 2012.

⁸ APU prosecutes cases before an administrative law judge who is also the NYPD Deputy Commissioner of Trials or an Assistant Deputy Commissioner of Trials. APU trials are open to public. After the trial, the Trial Commissioner makes a recommendation to the Police Commissioner.

analysis and supporting evidence including documentation and video footage obtained from NYPD.

An application within CTS called CTS Voting Application allows the Board Members to vote on allegation dispositions in accordance with the Disciplinary Matrix guidelines and record their votes.

NYPD utilizes a recordkeeping system called the Performance Overview Discipline System (PODS) to record and track CCRB cases. PODS was implemented on October 28, 2024, and replaced Disciplinary Administrative Database System (DADS). All cases that were in DADS from the year 2020 were migrated to PODS.

The Police Commissioner is required to report to CCRB in writing on any actions taken, including the level of discipline and penalty imposed, in all cases in which CCRB submitted findings and recommendations. In any cases that were substantiated by the board where the Police Commissioner's level of discipline or penalty differs from the recommendation made by the board, the Police Commissioner is required to provide a written report with a detailed explanation of the reasons for deviating from CCRB's recommendations. In addition, if the Police Commissioner imposes a lesser level of discipline or penalty, the report must include an explanation of how the disciplinary outcome was determined.

As detailed in Appendix II, CCRB closed a total of 8,801 complaints between January 2, 2024 and June 12, 2025.⁹ The board fully investigated 3,445 cases, including 1,375 substantiated cases and 2,070 not substantiated cases. In addition, the board closed (truncated) 3,234 cases due to its inability to fully investigate. Further, the board mediated or closed 2,122 cases.¹⁰

Objectives

The objectives of this audit were to (1) determine whether CCRB investigates police misconduct complaints in a timely manner and (2) assess NYPD's implementation rate of CCRB's recommendations.

Discussion of Audit Results with NYPD and CCRB

Exit Conference Summaries were separately sent to NYPD and CCRB. The Summaries were discussed with NYPD and CCRB officials at exit conferences held on December 1, 2025 and December 2, 2025, respectively. On December 8, 2025, we submitted a Draft Report to NYPD

⁹ The auditors excluded death related complaints, complaints on District Attorney's hold, complaints on NYPD's Force Investigation Division hold, and re-opened complaints.

¹⁰ CCRB closed cases due to MOS resignation, retirement, or because the MOS was no longer employed by the NYPD. It also closed cases due to ongoing budget constraints.

and CCRB with a request for written comments. We received written responses from CCRB and NYPD on December 18, 2025 and on December 19, 2025, respectively.

In its response, NYPD did not explicitly agree or disagree with the seven recommendations made to the department or the four recommendations made jointly to NYPD and CCRB, stating that it would work collaboratively with CCRB leadership to review and address the recommendations and evaluate current practices to determine what adjustments are practical for both agencies.

In addition, NYPD raised concerns in its response regarding audit report language that were also raised at or following the exit conference, and which were already addressed in the draft report.

In its response, CCRB did not explicitly agree or disagree with Recommendation #1, agreed with Recommendation #2, and did not address Recommendation #3. In addition, similarly to NYPD, CCRB did not explicitly agree or disagree with the four recommendations made jointly to NYPD and CCRB, stating that it would continue to work with NYPD to improve investigation times and the implementation of recommended outcomes. The board also stated that CCRB and NYPD would discuss whether the formal agreements recommended in the draft report could be implemented.

The Mayor's Office did not respond to the two recommendations made to appointing authorities or the two recommendations made to the City.

The written responses from both agencies have been fully considered and, where relevant, changes and comments have been added to the report. The full text of NYPD and CCRB's responses is included as an addendum to this report.

Detailed Findings

In the *Mayor's Management Report*, CCRB reported that the board's goals included improving the timeliness of investigations and set average target timeframes of 420 days (approximately 14 months) to complete full investigations and 480 days (approximately 16 months) to complete substantiated investigations. While CCRB met the board's stated average goals, more than half of fully investigated and fully investigated substantiated cases were completed in excess of the target timeframes.

Specifically, it took CCRB more than 420 days (more than 14 months) to complete and close 54.9% of fully investigated civilian complaints. Further, it took CCRB more than 480 days (more than 15 months) to complete and close 62% of all fully investigated substantiated civilian complaints. As a result, NYPD deemed many substantiated investigations too close to the expiration of the statute of limitations for NYPD's review. This, in turn, resulted in NYPD closing 51.5% of all cases substantiated by CCRB during the scope period without any review and without disciplinary action.

In addition, the audit found that while NYPD accepted CCRB recommendations and served charges in 86.3% of the most serious misconduct cases (charges cases), the department did not implement CCRB's discipline recommendations in more than 50% of substantiated non-charges cases between January 2, 2024 and May 29, 2025. The audit also found that the implementation rates varied significantly depending on the Police Commissioner that was active at the time discipline determinations were made. Specifically, Police Commissioner Jessica Tisch accepted and imposed the same level of discipline recommended by the board in 77.8% of substantiated cases, while Police Commissioner Edward Caban only imposed the same level of discipline in 22.9% of substantiated cases.

Finally, the audit found that NYPD did not consistently report disciplinary actions and penalties imposed against MOS to CCRB.

CCRB's Investigation Timeframes Did Not Leave Sufficient Time for NYPD to Review and Take Action Before Expiration of the Statute of Limitations

According to the 2024 and 2025 *Mayor's Management Reports*, CCRB's target timeframes to complete full investigations is 420 days (approximately 14 months) for not substantiated

investigations, and 480 days (approximately 16 months) for substantiated investigations.¹¹ Fully investigated cases include the time it takes CCRB to receive a complaint, the time it takes an investigator to complete the investigation and write a report, and the time it takes the board to review and vote on cases. According to CCRB officials, substantiated cases take longer to investigate because they tend to be more complex and time consuming.

CCRB's stated goal effectively allows NYPD 60 days to review substantiated cases—approximately two months, on average. During the audit scope period, NYPD expressed concern over the extended timeframes for CCRB investigations and board review, and the resulting short timeframes the department was given to fully process, analyze, and implement CCRB recommendations. This issue is discussed further below.

Even though CCRB's data shows that, on average, the board met its stated goals to complete all full investigations and substantiated investigations in 420 and 480 days, respectively, the auditors' review of CCRB's complaint data showed that more than half of fully investigated and fully investigated substantiated cases took prolonged periods to complete and significantly exceeded average target completion goals.

As detailed in Table 2 below, between January 2, 2024 and June 12, 2025, CCRB fully investigated and closed 3,445 cases, including 1,375 substantiated cases, and 2,070 not substantiated cases.

On average, it took CCRB 13.4 months or 416 calendar days to complete all full investigations. However, it took CCRB more than 420 days to complete and close 1,890 (54.9%) of the 3,445 full investigations.

Further, on average, it took CCRB 15.4 months, or 476 calendar days, to complete substantiated investigations. However, the auditors' review showed that CCRB closed 853 (62%) of the 1,375 cases in more than 480 days.

¹¹ According to the *Mayor's Management Report* indicators, the average time to complete a full investigation is the average number of days to complete a full investigation measured from the date CCRB received the complaint to the date when the Board Members render a final decision. The indicator measures the elapsed time from the start of the investigation to the closing date for all full investigations closed in the reporting period. The average time to complete a substantiated investigation is measured from the date CCRB received the complaint to the date when the board renders a final decision. The indicator measures the elapsed time from the start of the investigation to the closing date for all full substantiated investigations closed within the reporting period.

Table 2: Full Investigations Not Completed in a Timely Manner

CCRB Complaints Dispositions	Total # of Complaints Investigated and Closed	# of Complaints Investigated in More Than 420 or 480 Days	% of Complaints Investigated in More Than 420 or 480 Days
Fully Investigated – Substantiated Complaints	1,375	853	62%
Fully Investigated – Not Substantiated Complaints	2,070	Not Applicable	Not Applicable
Fully Investigated Complaints	3,445	1,890	54.9%

Causes of Delay

A variety of factors contributed to the CCRB’s prolonged investigation timeframes including a significant increase in the number of complaints received, staffing constraints, and delays in assigning cases to the Board Review Panels due to board vacancies. Delays in requesting and producing evidence also contributed to lengthy investigation timeframes. Each of these issues is discussed further below.

In addition, CCRB officials stated that factors outside of the board’s controls can cause investigations to take longer such as case complexity, amount of evidence to review, and the number of interviews needed to complete an investigation.

Significant Increase in the Number of Complaints and Staffing Constraints

The number of complaints received by CCRB significantly increased from 3,326 in Fiscal Year 2021 to 5,575 in FY2025, an increase of 2,249 (67.6%), as detailed in Table 3 below. During this same period, CCRB authorized headcount increased from 221 in FY2021 to 267 in FY2025, an increase of 46 (20.8%). Furthermore, CCRB experienced vacancy rates of between 22.1% and 14.1%.

Table 3: Complaints Received by CCRB Between Fiscal Years 2021 and 2025

Fiscal Year	# of Complaints Received by CCRB
2021	3,326
2022	3,483
2023	4,700
2024	5,644
2025	5,575
Grand Total	22,728

At New York City Council preliminary budget hearings for FYs 2021 through 2025, CCRB has repeatedly expressed concerns about the significant increase in the number of complaints, the expansion of the board's responsibilities to investigate additional types of complaints such as untruthful statements, the lack of adequate staffing due to underfunding, and their collective impact on investigator and prosecutor dockets and the timeliness of investigations and prosecution of the most serious misconduct cases (charges cases). The board consistently requested additional funding to hire more investigators, retain experienced investigators, and hire more prosecutors to handle charges cases. In FY2024, CCRB reported that for the first time, the board did not have enough money to investigate all of the complaints it received and stopped investigating certain types of complaints. This issue is discussed further below.

Table 4 below details CCRB's adopted and modified budget, authorized headcount, and actual headcount for FYs 2021 through 2025.

In the New York City Council's Response to the Fiscal Year 2024 Preliminary Budget, the City Council reported that CCRB was not meeting its City Charter mandated uniform headcount, which is at least 0.65% of NYPD's headcount. The City Council called on the administration to rightsize CCRB's budget to support hiring and increase the board's headcount to 329. However, CCRB's authorized headcount for FY2024 was only 244, 85 less than the requested amount.

Further, in the New York City Council's Response to the Fiscal Year 2025 Preliminary Budget, the City Council expressed concerns that Charter-mandated CCRB funding levels were not sufficient to provide adequate oversight due to the board's expanded responsibilities. The City Council recommended increasing CCRB's budget by \$15 million to enable the board to fill all vacant positions and to hire an additional 144 staff, for a total headcount of 376. However, CCRB's authorized headcount for FY2025 was only 267, 109 less than the requested amount.

Table 4: CCRB Adopted and Modified Budget and Staffing Levels for Fiscal Years 2021 through 2025

Fiscal Year	CCRB's Adopted Budget	CCRB's Modified Budget	CCRB's Authorized Staff Headcount	CCRB's Actual Staff Headcount
2021	\$19,470,298	\$21,113,693	221	181
2022	\$24,779,384	\$22,222,970	259	209
2023	\$23,548,261	\$23,441,390	259	221
2024	\$25,442,983	\$25,893,946	244	220
2025	\$27,802,694	\$27,359,719	267	234

Suspended Investigation of Certain Allegations

As previously mentioned, the number of complaints received by CCRB significantly increased from FY2021 to FY2025. CCRB testified that the increase placed a significant strain on the board's resources.¹² As a result, CCRB reported that, effective January 1, 2024, the board stopped investigating the following allegations when not accompanied by any other allegations within the Board's jurisdiction: "Failure to provide Right To Know Act cards;" "Refusal to provide name or shield number;" "Discourteous words or actions;" "Threats with no action;" "Refusal to process a civilian complaint;" "Forcible removal to a hospital;" and "Untruthful statements." CCRB reported that the board closed 614 (10.9%) of the 5,644 complaints received in FY2024 without investigating them. The number and percentage of cases closed due to budgetary constraints dramatically increased in FY2025. CCRB reported that it closed 1,479 (26.5%) of the 5,575 complaints received without investigating them.

Board Vacancies

The auditors' review of CCRB's complaint data shows that, while CCRB received, investigated, reported, and prepared both fully investigated substantiated and not substantiated cases in under 14 months, the cases sat waiting to be assigned to a Board Review Panel for months at a time. On average, it took 5.1 months for CCRB to assign cases to a Board Review Panel. This meant that case processing was stalled, pending review and vote, for months.

The fully-seated board is required to have 15 Board Members. In addition, the City Charter states that board panels must consist of at least three members and that panels cannot consist

¹² CCRB testified before City Council's Public Safety Committee in March 2025.

exclusively of members appointed by the City Council or the Mayor, or exclusively of members designated by the Police Commissioner. Further, the Rules of the City of New York state that each panel will consist of at least one member appointed by City Council, at least one designated by the Police Commissioner, and at least one appointed by the Mayor, “*unless such a panel composition would interfere with or unreasonably delay the CCRB’s operations.*” [Emphasis added.]¹³

At full capacity, the board can convene up to five panels at the same time to review and vote on cases. According to CCRB’s data, from August 2024 through September 2025, CCRB operated with 12 to 14 members due to unfilled vacancies; therefore, the board could only convene at most four (instead of five) panels at a given time.

Based on CCRB records, the board convened only three panels per month during Calendar Year 2024 to review and vote on both substantiated and not substantiated cases. From February through December 2024, a fourth panel was convened, but this panel did not meet every month and reviewed and voted only on not substantiated cases.¹⁴

In January 2025, after the audit was initiated, this panel started to review substantiated cases to address the backlog. Based on CTS records for January through September 2025, the fourth panel reviewed only substantiated cases in January and March through May 2025, and reviewed both substantiated and not substantiated cases during June through August 2025. This panel did not meet in February 2025 or September 2025.

When CCRB convened three panels, they reviewed and voted on between 154 and 184 cases. With four panels, CCRB reviewed and voted on between 157 and 257 cases.

As of December 2, 2025, there were 1,255 cases awaiting Board review.

At the City Council preliminary budget hearing held in March 2025, CCRB testified that Board vacancies significantly slowed case processing time. Additionally, at a City Council Charter Revision hearing held in March 2025, CCRB testified that expanding the Board would enhance its capacity to evaluate cases efficiently and reduce the current backlog of cases. The interim Board Chair stated that this would improve the CCRB’s oversight, ensure accountability, and strengthen public trust.

¹³ According to Chapter 18-A, Section 440(c)(2) of the Charter, “no panel will consist exclusively of members designated by the Police Commissioner or appointed by the Mayor or the City Council. Panel membership will be determined by the Chair, but each panel will consist of at least one member appointed by City Council, at least one designated by the Police Commissioner, and at least one appointed by the Mayor, unless such a panel composition would interfere with or unreasonably delay the CCRB’s operations.”

¹⁴ The fourth panel met in February, April through August, November, and December 2024. This panel did not meet in March, September and October 2024.

Delays in Requesting and Providing Evidence

In addition to the delays in assigning completed cases to a Review Panel, CCRB's timeline may have been extended by CCRB delays in requesting and collecting documentation from NYPD, and NYPD's delays in providing requested documentation to CCRB.

The auditors reviewed NYPD information request data provided by CCRB and concluded that, on average, it took CCRB 185 days (six months) to request and collect evidentiary materials from NYPD.

In its response to the Draft Report, CCRB stated that the auditors' calculation of the 185-day figure appeared to take the date of requests for MOS' Summary of Employment History (SEH) into account, and further, that SEH is not requested until the end of the investigation when the case is ready for review by the board.

However, as stated in this report, the full investigation process includes the time it takes CCRB to receive a complaint, the time it takes an investigator to complete the investigation and write a report, and the time it takes the board to review and vote on cases making the board review and voting process part of the investigation process as well. Auditors properly included the date when CCRB made the first request and the date when CCRB received the last requested information, to determine how long it took CCRB to request and collect evidentiary materials from NYPD to facilitate full investigations.

Moreover, the auditors' calculation is consistent with CCRB's position that requesting SEH at a later juncture helps to ensure that the board has up-to-date employment history when it reviews a case. SEH requests are an integral part of full investigations and should be included in the calculation of the timeliness of CCRB's evidentiary material requests from NYPD.

The auditors also reviewed NYPD's data to determine how long it took NYPD to fulfill CCRB's evidentiary requests. In a memorandum of understanding between NYPD and CCRB, NYPD agreed to produce body-worn camera footage within 10 days for unredacted footage and within 25 days for redacted footage. While the parties did not agree to timeframes for producing other NYPD evidentiary materials, NYPD's informal, internal policy is to produce materials within 30 days. Based on the available data (for 1,139 out of the 3,445 substantiated and not substantiated complaints), on average it took the department 30 days to provide documents to CCRB.¹⁵ The data also showed that while NYPD completed 787 (69.1%) of CCRB's evidence requests within 30 calendar days, it took the department between 31 and 90 days to complete 256 (22.5%) CCRB's evidence requests and more than 90 days to complete 96 (8.4%) of CCRB's evidence requests.

As a result of delays in closing fully investigated substantiated complaints, the board submitted more than half of all substantiated cases toward the end of the statute of limitations. This limited

¹⁵ There was no evidentiary request information available for the remaining 2,306 complaints in NYPD's data.

NYPD's ability to review and act on CCRB investigations. As discussed further in the report, NYPD closed more than half of CCRB's substantiated cases that the board submitted to the department between January 2, 2024 and May 29, 2025 without review or disciplinary recommendation, due to the statute of limitations.

The delays in CCRB's investigative processes can be detrimental to the public seeking case resolution. Lengthy investigations may reduce public trust in CCRB's processes and discourage future reporting of misconduct. Also, according to NYPD, the prolonged case investigation and closing timeframes can have severe negative effects on individual MOS and on the department as a whole. Specifically, transfers and promotional advancement are often held in abeyance while investigations remain open.

Appointing Authorities Did Not Fill Board Vacancies

As stated in this report, Board Members are appointed by such appointing authorities as the City Council, the Public Advocate, and the Mayor. Three members are designated by the Police Commissioner and appointed by the Mayor. To fill a board vacancy, the City Charter requires the appointing authorities to choose a new member in the same manner as the original appointment within 60 days from the date such vacancy occurred.

While the fully-seated board is required to have 15 Board Members from August 2024 through December 8, 2025, CCRB operated with 11 to 14 members due to unfilled vacancies. As of December 11, 2025, the board had two vacancies—two City Council appointees, one of which has been open for over two years.

The City Charter requires the Mayor and the City Council to jointly appoint one Board Member as chair of the board. In February 2022, the Mayor appointed an acting Board Member to serve as an interim Board Chair who later resigned in August 2024. In December 2024, four months later, the Mayor appointed a new interim Board Chair who was also serving as the City Council's appointee for Staten Island. This interim chair then resigned in November 2025 and yet another new interim chair was appointed by the Mayor on December 9, 2025.

As stated in this report, unfilled vacancies may have contributed to the board's prolonged investigation timeframes.

In addition, the board had not had a permanent Board Chair since 2022, almost four years. As stated above, the acting Board Chairs have been solely appointed by the Mayor which may have impeded CCRB's independence.

The Board Chair's powers and authority include, but are not limited to, assignment of complaints to board review panels or a full board, reassignment of complaints to a new panel, reopening a

case previously closed without a full investigation, reconsidering any case previously closed with a full investigation, dismissal of any charges after a case had been referred to APU, and recommending suspension or modified assignment of MOS while the prosecution of charges remain pending.

While the Charter allows the Mayor to select an interim Chair alone, prolonged periods during which the Chair represents a single appointing authority potentially undermines the purpose of the appointing structure, which was intended to ensure independence from NYPD, a mayoral agency, and the Mayor.

NYPD and CCRB At Odds Over Timing

According to NYPD, the department had multiple exchanges with CCRB regarding the board's late submission of substantiated non-charges cases. In one of the communications with the board, NYPD expressed concern over the extended time frames for CCRB investigations and board review, and the resulting short time frames the department was given to fully process, analyze, and implement CCRB's recommendations.

To address these concerns, on September 17, 2021, NYPD requested that CCRB submit substantiated non-charges cases at least 120 business days—and charges cases at least 90 business days—prior to the expiration of the statute of limitations. Subsequently, NYPD temporarily eased the implementation of these timeframes and requested that CCRB submit all cases (non-charges and charges) at least 30 days prior to the expiration of the statute of limitations.

For approximately two years, from February 17, 2023 through February 28, 2025, NYPD generally required a minimum of 60 days prior to the expiration of the statute of limitations to process and analyze CCRB recommendations and during this period refused to review cases received beyond this time frame.¹⁶ On March 1, 2025, Police Commissioner Tisch eliminated this policy and stated that the department would make every effort to analyze and process cases regardless of when cases were received.

¹⁶ Effective November 12, 2024, after Police Commissioner Caban's separation from the department and before Police Commissioner Tisch's appointment, NYPD implemented CCRB case processing guidelines that required the department to review non-charges cases if they were submitted at least 90 days before the expiration of the statute of limitations. This policy was in effect for less than one month and was reversed by Police Commissioner Tisch when she took office on November 25, 2024.

NYPD's Acceptance of CCRB's Recommendations for Substantiated Non-Charges Cases Varied Significantly by Police Commissioner

Based on the auditors' review, Police Commissioners' acceptance of CCRB's discipline recommendations for non-charges cases varied significantly.¹⁷ As detailed in Table 5 below, Police Commissioner Tisch accepted and imposed the same or higher level of discipline recommended by the board in 705 (77.8%) of 906 cases submitted for review. In contrast, the data shows that Police Commissioner Donlon only imposed the same or higher level of discipline for 19 (6.3%) of the 302 cases reviewed, and Police Commissioner Caban only imposed the same or higher level of discipline in 165 of 721 (22.9%) cases that were submitted to their offices for review.

Table 5: NYPD Acceptance Rate for Non-Charges Cases by Police Commissioner

Police Commissioner	Total # of Accepted Cases	Total # of Reviewed Cases	Compliance Rate
Jessica Tisch 11/25/2024 – current	705	906	77.8%
Thomas Donlon 9/13/2024 – 11/25/2024 (acting)	19	302	6.3%
Edward Caban 7/17/2023 – 9/13/2024 ¹⁸	165	721	22.9%
Grand Total	889	1,929	100%

The timing of submission of non-charges cases to NYPD by CCRB, and each Commissioner's response to the limited timeframes also seems to have impacted final implementation rates. As noted above, CCRB and NYPD had trouble reaching agreement on timing. Some Commissioners responded to this by refusing to consider cases submitted by CCRB if they were not submitted within NYPD's prescribed 60-day timeframe, increasing the percentage of cases not reviewed. On March 1, 2025, Police Commissioner Tisch eliminated the policy and stated that the

¹⁷ CCRB and NYPD consider the board's discipline recommendation to be accepted if the Police Commissioner impose the same level of discipline or a higher level of discipline.

¹⁸ Prior to his appointment, Edward Caban served as the acting Police Commissioner from July 1, 2023 to July 17, 2023. This time period precedes the audit scope.

department would make every effort to analyze and process cases regardless of when cases were received.

At the time Police Commissioner Caban was in the position and the 60-day policy was in effect, NYPD administratively closed a high number of CCRB-substantiated non-charges cases because the department determined that they were submitted too close to the statute of limitations' expiration. Based on CCRB data, 538 (74.6%) of 721 cases that were reviewed by Police Commissioner Caban's office were closed without review or discipline recommendations. This is reflected in Table 6 below.

Table 6: Substantiated Non-charges Cases Administratively Closed by NYPD Approaching Statute of Limitations by Police Commissioner

Active Police Commissioner	<=30 bus. Days	<=60>30 bus. Days	<=90>60 bus. days	>=90 bus. days	After Expiration of SOL	Total
Jessica Tisch	160	9	0	0	3	172
Thomas Donlon (acting)	225	58	0	0	0	283
Edward Caban	25	510	0	0	3	538
Grand Total	410	577	0	0	6	993

NYPD Did Not Accept CCRB Recommended Discipline for More than 50% of Substantiated Non-Charges Cases

The auditors' review of CCRB data showed that between January 2, 2024 and May 29, 2025, CCRB investigated 1,143 complaints, resulting in 2,000 substantiated non-charges cases submitted to NYPD for review and final disciplinary determination. The audit found that NYPD did not implement CCRB's disciplinary recommendations in 1,040 (53.9%) of cases.

As detailed in Table 7 below, 71 of the 2,000 cases were excluded from the NYPD compliance rate analysis because they were either previously investigated by NYPD's Internal Affairs Bureau (IAB) (31); closed administratively due to MOS' resignation, retirement, or death (20); or were still being reviewed by NYPD (20).

Table 7: Substantiated Non-Charges Cases Excluded from NYPD Compliance Rate Analysis

Case Status	# of Cases
Closed Administratively - MOS Resigned/Retired/Deceased	20
Previously Adjudicated	31
Active Cases	20
Total	71

As detailed in Table 8 below, the auditors found that of the remaining 1,929 substantiated non-charges cases, NYPD accepted CCRB's discipline recommendations in 889 (46.1%) cases.

For the remaining 1,040 (53.9%) cases, NYPD did not accept CCRB's recommendation and imposed a lower level of discipline or no discipline, or determined that the cases were submitted by CCRB too close to the expiration of the statute of limitations and did not review them, as detailed in Table 8 below.

Specifically, NYPD administratively closed 993 (95.5%) of 1,040 cases without reviewing them, stating that the department did not have sufficient time to review cases because they were submitted too close to the expiration of the statute of limitations. In these instances, no penalties were imposed. In addition, NYPD reviewed 33 (3.2%) cases and determined that no disciplinary action should be taken against the subject MOS. The department did not accept CCRB's disciplinary recommendation and imposed a lesser discipline in 14 (1.3%) cases (for example, CCRB recommended Command Discipline B but NYPD ultimately recommended and imposed Command Discipline A).

Table 8: NYPD Concurrence Rate for Substantiated Non-Charges Cases

Case Status	# of Cases	% of Cases
Concurred with CCRB Discipline Recommendation	889	46.1%
Closed Administratively without Review	993	51.5%
Did Not Concur with Discipline Recommendation – No Discipline Imposed	33	1.7%
Did Not Concur with Discipline Recommendation – Lower Level of Discipline	14	0.7%
Total	1,929	100%

As noted in the discussion above, and as also shown in Table 8, the largest percentage of cases that were not adopted by NYPD were not even reviewed by the department—993 (51.5%) of the 1,929 substantiated non-charges cases were submitted to NYPD but were closed without review due to timing issues and NYPD’s refusal to consider cases submitted outside of a 60-day window it set.

In its formal written response, NYPD argued that cases which were administratively closed because of the "Short SOL" policy, which is no longer in effect, should have been excluded from the auditors’ calculation of the implementation rate of CCRB’s recommendations for non-charges cases.

However, excluding these cases from the calculation would not be appropriate and would overstate NYPD’s concurrence rate. The 993 cases at issue here were administratively closed based on a policy taken by NYPD not to review them. This did have an impact on NYPD’s concurrence rate.

In addition to NYPD’s stated policy, a further cause may have been a shortage of NYPD attorneys responsible for reviewing CCRB cases. Table 9 below details NYPD’s budgeted and actual headcounts for the Department Advocate’s Office (which reviews CCRB cases) for Fiscal Years 2021 through 2025. According to NYPD’s data, while, in general, DAO’s budgeted and actual headcounts stayed relatively flat throughout the five-year period, the office experience continuous vacancies. NYPD also reported that DAO experienced continuous turnover. In addition, according to NYPD officials, while DAO has specific attorneys and staff assigned to process CCRB cases, all DAO attorneys assist with the processing of CCRB cases. Additionally, NYPD experienced frequent changes in administration; in the span of two years, the department had three different Police Commissioners.

Table 9: NYPD DAO's Staffing Levels for Fiscal Years 2021 Through 2025

Fiscal Year	DAO's Budgeted Staff Headcount	DAO's Actual Staff Headcount	DAO's Vacancies
2021	48	38	10
2022	53	46	7
2023	55	52	3
2024	54	51	3
2025	50	43	7

These matters should be addressed. While Police Commissioner Tisch stated that NYPD would make every effort to analyze and process all cases effective March 1, 2025, DAO vacancies and turnover could impact the Office's ability to review cases. When NYPD does not review CCRB findings, it undermines CCRB's oversight. It may also disrupt the MOS disciplinary process and weaken NYPD accountability, allowing inappropriate behavior to continue. Finally, in unreviewed cases, alleged victims do not receive fair assessment of their cases or closure. When NYPD limits or eliminates the opportunity to resolve disciplinary issues, public trust in the police is undermined.

In its response, NYPD stated the audit suggests that at present NYPD does not review CCRB findings. However, the audit acknowledges the department's current policy to make every effort to analyze and process cases. As noted, this new policy became effective March 1, 2025

In addition, in its response to the Draft Report, NYPD asserts that staff fluctuations did not prevent DAO from prioritizing CCRB matters or fulfilling the department's responsibilities. NYPD also stated that it was inaccurate to conclude that DAO lacks sufficient resources for CCRB matters or that staffing levels are a primary factor affecting adjudication outcomes.

However, the report does not state that staffing was a primary factor affecting adjudication. The report merely states that a shortage of NYPD attorneys and turnover *may* have contributed.

NYPD Generally Served Charges on MOS in the Most Serious Misconduct Cases

The auditors' review of CCRB's allegations and Administrative Prosecution Unit (APU) data showed that NYPD accepted CCRB's recommendations in 541 (86.3%) of 627 cases involving the most serious charges. In these instances, NYPD served charges on MOS.¹⁹

As detailed in Table 10, for 375 (69.3%) of the 541 cases—the majority—APU decisions are still pending. In addition, NYPD decisions were pending for 86 (15.9%) of the 541 cases. Two cases were closed because the subject MOS resigned. For the remaining 78 cases, 69 resulted in discipline. Of these, 64 were resolved through plea deals which resulted in discipline ranging from “Formalized Training” to “Charges and Specifications.” Five cases were retained by the Police Commissioner and resulted in lesser discipline, and nine resulted in no discipline—one case was dismissed by the APU; four went to trial, where the MOS were found not guilty; three were resolved through plea deals without discipline; and one was decided by the then Police Commissioner.

¹⁹ Between January 4, 2024 and May 29, 2025, CCRB substantiated misconduct allegations made against 560 MOS and recommended Charges and Specifications in 650 cases. There was no available information for 23 of the 650 cases, and for these, the auditors were unable to determine whether NYPD served charges.

Table 10: Cases Outcomes Where Charges Were Served

	Charges Case Status	# of Cases
Charges Served with Discipline Imposed (69 cases)	Resolved by Plea - Command Discipline A	19
	Resolved by Plea - Command Discipline B	26
	Resolved by Plea - Formalized Training	14
	Resolved by Plea – Charges and Specifications	5
	Retained by PC with Discipline	5
Charges Served with No Discipline Imposed (11 cases)	Retained by PC without Discipline	1
	Case Dismissed by APU	1
	Went to Trial, MOS Found not Guilty	4
	Resolved by Plea – No Discipline	3
	MOS Resigned	2
Outcome Pending (461 cases)	Decision Pending with APU	375
	Decision Pending by NYPD	86
	Grand Total	541

In the remaining 86 (13.7%) of the 627 cases that had available information, NYPD did not serve charges and instead retained the cases internally. Of these, 57 cases resulted in discipline ranging from “Formalized Training” to “Command Discipline B” and 29 cases resulted in no discipline as shown in Table 11 below.

Table 11: Case Outcomes Where Charges Were Not Served

Charges Case Outcome	# of Cases
Retained with Discipline	
Formalized Training	3
Command Discipline A	47
Command Discipline B	7
Retained with Discipline Total	57
Retained without Discipline	29
Charges not Served Grand Total	86

NYPD Did Not Always Report Actions Taken Against MOS

The City Charter requires NYPD to report on any actions taken in substantiated cases to CCRB in writing, including the level of discipline and penalty imposed, in all cases in which CCRB submitted findings and recommendations. In cases where the Police Commissioner intends to impose or has imposed a different level of discipline or penalty than that recommended by the board, the Police Commissioner is required to provide a written report with a detailed explanation of the reasons for deviating from CCRB's recommendations. In addition, if the Police Commissioner imposes a lesser level of discipline or penalty, the report must include an explanation of how the disciplinary outcome was determined. The Charter requires the Police Commissioner to provide a written report no later than 45 days after the imposition of the discipline.

CCRB uses the discipline and penalty information reported by the Police Commissioner to inform victims of the final disciplinary action imposed against subject MOS. According to the New York City Rules, CCRB is required to notify the complainant and/or alleged victim of the final action taken by the Police Commissioner.

The auditors' review showed that NYPD did not report disciplinary actions or penalties imposed against MOS in 289 (14.5%) of 2,000 substantiated non-charges cases submitted to NYPD between January 2, 2024 and May 29, 2025.

After the auditors asked about the final dispositions for these 289 cases, NYPD reported the actions taken for 149 cases. However, as of August 2025, NYPD still has not reported to CCRB

actions taken against MOS in the remaining 93 cases—48 of which were submitted by CCRB to the department in Calendar Year 2024.²⁰

Since NYPD did not report or did not promptly report information to CCRB, the board was not able to notify complainants, victims, or the public of disciplinary actions and penalties imposed against MOS.

In addition, NYPD did not report penalties imposed for 332 of the 909 (36.5%) cases for which the department reported that disciplinary action was taken against MOS.

In its response, NYPD stated that CCRB's data showed that, as of August 22, 2025, the department had reported the penalty outcomes for 307 of the 332 subject cases. As of November 24, 2025, the department reported the penalty outcomes for an additional 14 of the subject 332 cases. For the remaining 11 cases, NYPD stated that it had not yet reported the disciplinary action taken.

However, the department did not specify in its response what CCRB data was used to draw such conclusion. The auditors reviewed CCRB's publicly reported data dated as of December 22, 2025, and concluded that NYPD had reported specific penalties for an additional seven of the 332 cases but still had not reported penalties imposed for 325 of the 909 (35.8%) cases.

NYPD's inconsistent reporting of final dispositions to CCRB hinders the board's ability to analyze and evaluate the effectiveness of MOS discipline and prevents CCRB from fulfilling its obligation to notify complainants of final dispositions. In addition, it may cause underreporting and misrepresentation in reporting to the public, including the outcomes of cases contained in CCRB's annual reports.

Finally, victims seeking closure may remain unaware of case outcomes for long periods of time, which may cause further public confusion and frustration.

²⁰ The draft referenced 140 cases. This number was modified based on the auditors' review of DAO Closing Reports for the period of February 1, 2024 through August 29, 2025 provided by CCRB. NYPD periodically reports the department's final allegation disposition and penalty determination to CCRB via DAO Closing Reports.

Recommendations

To address the abovementioned findings, the auditors propose that NYPD and CCRB should jointly:

1. Enter a formal agreement concerning timeframes for requesting and submitting requested evidentiary materials, other than body-worn camera footage.

CCRB Response: CCRB did not agree or disagree with this recommendation, stating that it would continue to work and discuss with NYPD whether formal agreements can be implemented.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would work collaboratively with CCRB and evaluate current timelines, referral procedures, and information-sharing practices to determine what adjustments are practical for both agencies.

2. Reach agreement concerning deadlines for case submissions from CCRB to NYPD.

CCRB Response: CCRB did not agree or disagree with this recommendation, stating that it would continue to work with NYPD to improve investigation times and the implementation of recommended outcomes.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would work collaboratively with CCRB and evaluate current timelines, referral procedures, and information-sharing practices to determine what adjustments are practical for both agencies.

3. Enter into a formal agreement with NYPD outlining standardized communication protocols for reporting final Police Commissioner recommendations for CCRB cases.

CCRB Response: CCRB did not agree or disagree with this recommendation, stating that it would continue to work with NYPD and discuss whether formal agreements can be implemented.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would work collaboratively with CCRB and evaluate current timelines, referral procedures, and information-sharing practices to determine what adjustments are practical for both agencies.

4. Work together on integrating a system for tracking dispositions of cases submitted to NYPD by CCRB.

CCRB Response: CCRB did not agree or disagree with this recommendation, stating that the agency would continue to work with NYPD to improve investigation times and the implementation of recommended outcomes.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would work collaboratively with CCRB and evaluate current timelines, referral procedures, and information-sharing practices to determine what adjustments are practical for both agencies.

In addition, the auditors propose that NYPD should:

1. Develop written internal policies and procedures providing timeframe guidelines for CCRB cases approaching the expiration of SOL.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it recognizes the value of clearer guidance when cases approach the statute of limitations and would review internally whether additional written procedures would be useful.

Auditor Comment: It is essential that NYPD establish written procedures providing timeframe guidelines for CCRB cases approaching the expiration of SOL, to ensure NYPD's personnel compliance with such procedures and to enhance operational efficiency.

2. Establish formal internal deadlines for responding to CCRB requests for evidentiary materials.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would examine whether internal reference points or timelines would help reinforce existing practices.

Auditor Comment: Establishing formal internal deadlines for responding to CCRB requests for evidentiary material is essential for NYPD to ensure that there is no delay and to facilitate CCRB's investigative processes. The auditors found that delays in closing fully investigated substantiated complaints impacted the board's ability to complete cases well within the statute of limitations. This, in turn, limited NYPD's ability to review and act on CCRB investigations.

3. Enhance recruitment efforts for DAO legal staff and seek additional funding to ensure adequate staffing levels, for both new hires and retention of existing staff.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would continue to evaluate personnel needs within DAO.

Auditor Comment: It is important that DAO maintains adequate staffing levels. While Police Commissioner Tisch stated that NYPD would make every effort to analyze and process all cases effective March 1, 2025, DAO vacancies and turnover potentially impact the Office's ability to review all CCRB cases. DAO should ensure adequate staffing levels for new hires and retention of existing staff to prevent the closing of CCRB cases without review.

4. Ensure that penalties match discipline determinations in compliance with the Disciplinary Matrix.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would continue utilizing the Disciplinary Matrix consistent with due process and the Police Commissioner's decision-making authority in disciplinary matters.

5. Develop and implement internal policies and procedures requiring the department to comply with the New York City Charter and Rules and report specific MOS penalties to CCRB.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it would review whether internal policy adjustments would help clarify reporting practices and reinforce existing compliance obligations, while ensuring that any measures remain consistent with statutory protections.

Auditor Comment: As stated in this report, as of December 22, 2025, NYPD still had not reported specific penalties imposed for 325 of the 909 (35.8%) cases. NYPD's inconsistent reporting of final dispositions and penalties to CCRB hinders the board's ability to analyze and evaluate the effectiveness of MOS discipline and prevents CCRB from fulfilling its obligation to notify complainants of final dispositions. In addition, it may cause underreporting and misrepresentation in reporting to the public, including the outcomes of cases contained in CCRB's annual reports.

6. Develop and implement recordkeeping system application controls and features allowing automated and streamlined reporting on CCRB cases, including the Police Commissioner's final decision.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that the department was already taking steps to improve documentation and reporting in connection with CCRB cases and would continue to do so.

Auditor Comment: As stated in this report, NYPD's inconsistent reporting of final dispositions to CCRB hinders the board's ability to analyze and evaluate the effectiveness of MOS discipline and prevents CCRB from fulfilling its obligation to notify complainants of final dispositions. In addition, it may cause underreporting and misrepresentation in reporting to the public, including the outcomes of cases contained in CCRB's annual reports. Finally, victims seeking closure may remain unaware of case outcomes for long periods of time, which may cause further public confusion and frustration.

As of August 2025, NYPD still has not reported to CCRB actions taken against MOS in 93 cases—48 of which were submitted by CCRB to the department in Calendar Year 2024. In addition, according to CCRB's publicly reported data, as of December 22, 2025, NYPD still has not reported penalties imposed for 325 of the 909 (35.8%) cases for which the department reported that disciplinary action was taken against MOS.

7. Ensure that its recordkeeping system tracks compliance with applicable New York City Rules and the Charter when preparing and sharing information with CCRB on CCRB cases.

NYPD Response: NYPD did not agree or disagree with this recommendation, stating that it had implemented a review of its current practices to verify that required information is communicated accurately in accordance with the law.

The auditors also propose that CCRB should:

1. Establish formal timeframes for requesting evidentiary documentation from NYPD to address the bottlenecks identified by the auditors.

CCRB Response: CCRB did not agree or disagree with this recommendation, stating that the board already had investigative timeframes in place and would consider whether additional timeframes were feasible.

Auditor Comment: While CCRB has established timeframes related to some investigative processes, the board has not established formal timeframes for requesting and obtaining evidentiary documentation from NYPD. CCRB should establish such timeframes to address the bottlenecks that may have contributed to delayed investigations.

2. Continue to seek additional funding to ensure that the board can investigate all complaints under its jurisdiction and NYPD can review, analyze, and process the board's recommendations within the statute of limitations.

CCRB Response: CCRB agreed with this recommendation and stated that it has already been implemented.

3. Design and implement internal policies and procedures providing guidance on how the board should handle the cases without outstanding final allegation dispositions and MOS penalties.

CCRB Response: CCRB did not address this recommendation, stating that the board would benefit from a clearer explanation of the meaning of the recommendations.

Auditor Comment: CCRB uses the discipline and penalty information reported by the Police Commissioner to inform victims of the final disciplinary action imposed against subject MOS. According to the New York City Rules, CCRB is required to notify the complainant and/or alleged victim of the final action taken by the Police Commissioner. The audit found that, as of August 2025, NYPD had not reported to CCRB actions taken against MOS in 93 cases—48 of which were submitted by CCRB to the department in Calendar Year 2024.

CCRB should design and establish internal policies and procedures providing guidance on how the board should handle the cases that NYPD did not report final allegation dispositions and MOS penalties for. In addition, CCRB should immediately request the final allegation disposition information for the 48 cases that were shared with NYPD in Calendar Year 2024 and follow-up on the 45 cases that were shared with NYPD in Calendar Year 2025.

Further, the auditors propose that the authorities responsible for appointing Board Members should:

1. Fill existing board vacancies and ensure that future vacancies are filled within 60 days to support scheduling the maximum number of Board Review Panels each month.

Auditor Comment: The Mayor's Office did not provide a response to this recommendation.

2. Ensure the Board Chair vacancy is filled within the Charter mandates to facilitate the timely progression of CCRB operations and to maintain CCRB's independence.

Auditor Comment: The Mayor's Office did not provide a response to this recommendation.

Finally, the auditors propose that the City should:

1. Consider increasing the number of CCRB members to enable the board to convene more panels and complete investigations faster.

Auditor Comment: The Mayor's Office did not provide a response to this recommendation.

2. Comply with Charter mandated funding levels for CCRB to account for the historical increases in the number of complaints and the board's expanded responsibilities, and to ensure that the board can investigate all complaints received under its jurisdiction within the statute of limitations.

Auditor Comment: The Mayor's Office did not provide a response to this recommendation.

Recommendations Follow-up

Follow-up will be conducted periodically to determine the implementation status of each recommendation contained in this report. Agency reported status updates are included in the Audit Recommendations Tracker available here: <https://comptroller.nyc.gov/services/for-the-public/audit/audit-recommendations-tracker/>

Scope and Methodology

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). GAGAS requires that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions within the context of our audit objective(s). This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit was January 1, 2024 through September 30, 2025.

To gain an understanding of CCRB's investigation of police misconduct complaints, the auditors conducted interviews with CCRB's Investigations Unit, CCRB's NYPD Relations Department, and Administrative Prosecution Unit representatives.

To gain an understanding of NYPD's processes related to review of CCRB cases, the auditors conducted interviews with NYPD's Department Advocate's Office and NYPD's CCRB Liaison Unit representatives.

To obtain an understanding of CCRB's investigation, voting and administrative prosecution processes, the auditors reviewed CCRB Investigative Manual, CCRB APU Manual, and CCRB CTS User Manual. In addition, the auditors reviewed Title 38-A of the New York City Rules, Chapter 18-A of the New York City Charter and various Memorandum of Understanding between CCRB and NYPD. The auditors also reviewed NYPD's Disciplinary Matrix and NYPD's Civilian Complaint Review Board 2025 Policy.

In addition, the auditors conducted walkthroughs of CCRB's Complaint Tracking System and NYPD's Performance Overview Discipline System. Further, the auditors observed data extraction from both computer systems.

To assess the integrity of CCRB's computer-processed allegation data, the auditors selected a random sample of substantiated non-charges cases closed by CCRB between January 17, 2024 and May 29, 2025 and compared NYPD Allegation Disposition and NYPD Officer Penalty data to NYPD's DAO closing reports and departure letters obtained directly from the department.

To determine how long it took CCRB to complete full investigations and substantiated investigations, the auditors utilized CCRB's complaint data for the period between January 2024 and June 2025. The auditors utilized the dates when CCRB received civilian complaints and the dates when the Board Review Panels met to review and vote on allegation dispositions and issue discipline recommendations.

To assess NYPD's implementation rates, the auditors utilized CCRB's allegation data and NYPD's data related to cases closed by CCRB for the period between January 2024 and June

2025. The auditors compared the board's discipline recommendations to Police Commissioners' final discipline recommendations. In addition, the auditors assessed NYPD's implementation rates by the active Police Commissioner.

To analyze the composition of the board and the Board Review Panels, the auditors utilized Board Member appointment letters, Board Member resignation letters, and board meeting minutes. In addition, the auditors reviewed CCRB's Board Review Panel meeting data for the period between January 2024 and September 2025.

The results of the above tests, while not projectable to their respective populations, provide a reasonable basis for auditors to evaluate whether CCRB investigates police misconduct complaints in a timely manner and whether NYPD implements the board's recommendations and assesses the department's implementation rate.

Appendix I

Case Disposition Definitions

- **Substantiated:** there is sufficient credible evidence to believe that the subject officer committed the alleged act without legal justification. Substantiated cases are sent to NYPD with a disciplinary recommendation.
- **Not Substantiated:**
- **Officer Unidentified:** CCRB was unable to identify the officers who committed the alleged misconduct.
- **Unable to Determine:** there was insufficient evidence to determine whether MOS did or did not commit the alleged misconduct.
- **Unfounded:** there is sufficient evidence that the subject MOS did not commit the alleged misconduct.
 - **Within NYPD Guidelines:** there is sufficient evidence that subject MOS was found to have committed the act alleged, but MOS' actions were determined to be lawful.
- **Complaint Withdrawn:** the complainant withdrew the complaint.
- **Administrative Closure:** the case was referred to the board by another agency, not by a member of the public, and the board was unable to conduct a full investigation.
- **Unable to Investigate:** the complainant or the alleged victim could not be reached or located, the participation of the complainant or the alleged victim was insufficient to enable the board to conduct a full investigation, or the board could not identify the alleged victim and was unable to conduct a full investigation.
- **Closed – Pending Litigation:** the case is closed due to related concurrent civil or criminal litigation.
- **Referral:** the complaint was referred to another governmental entity.
- **No Jurisdiction:** the complaint does not fall within the jurisdiction of the board.
- **Other Possible Misconduct Noted:** the board found evidence during its investigation that an officer committed misconduct not traditionally investigated by the board, but about which NYPD should be aware.
- **Mediated:** the parties to the mediation agreed that the complaint should be considered as having been resolved through mediation.
- **Mediation Attempted:** the parties agreed to mediate the complaint but the civilian subsequently did not participate in the mediation.
- **Miscellaneous:** the subject officer is no longer a member of NYPD.

- **OMB PEG Directive (SRAD) Closure:** On September 9, 2023, the Office of Management and Budget (OMB) announced citywide budget cuts as part of its Program to Eliminate the Gap (PEG) initiative. As a result, due to a high number of complaints and ongoing budget constraints, effective January 1, 2024, CCRB suspended some types of investigation as part of its Strategic Resource Allocation Determination (SRAD). CCRB suspended investigating allegations that include but are not limited to refusal to provide name or shield number with no other allegations; discourteous words or actions with no other allegations; threats with no action with no other allegations; refusal to process a civilian complaint with no other allegations; forcible removal to hospital with no other allegations; and untruthful statements with no other allegations. If a complaint contains one of the above allegations in addition to other allegations that still fall within CCRB jurisdiction, every allegation in the complaint will still be investigated.

Appendix II

CCRB Complaints Closed Between January 2024 and June 2025

CCRB Complaint Dispositions	# of Complaints Closed
Fully Investigated-Substantiated Complaints	
Substantiated (Charges)	457
Substantiated (Command Discipline A)	444
Substantiated (Command Discipline B)	266
Substantiated (Formalized Training)	208
Total Fully Investigated-Substantiated Complaints	1,375
<u>Fully investigated-Not Substantiated Complaints</u>	
Officer(s) Unidentified	180
Unable to Determine	708
Unfounded	711
Within NYPD Guidelines	471
Total Fully Investigated-Not Substantiated Complaints	2,070
Total Fully investigated Complaints	3,445
<u>Non-fully Investigated (Truncated) Complaints</u>	
Administratively Closed	7
Alleged Victim Unavailable	134
Alleged Victim Uncooperative	93
Closed - Pending Litigation	896
Complainant Unavailable	789

CCRB Complaint Dispositions	# of Complaints Closed
Complainant Uncooperative	892
Victim Unidentified	45
Witness Uncooperative	3
Complaint Withdrawn	375
Total Non-Fully Investigated (Truncated) Complaints	3,234
<u>Other Complaint Disposition Categories</u>	
Mediated	66
Miscellaneous	3
Miscellaneous - Subject Resigned	17
Miscellaneous - Subject Retired	28
OMB PEG Directive (SRAD) Closure	2,008
Total Other Complaint Disposition Categories	2,122
Grand Total	8,801



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PAT SMITH
INTERIM CHAIR

December 18, 2025

VIA EMAIL

Maura Hayes-Chaffe
Deputy Comptroller for Audit, Audit Bureau
Office of New York City Comptroller Brad Lander
1 Centre Street, 11th Floor North
New York, NY 10007

Re: Draft Report for the Audit of the Timeliness of Civilian Complaint Review Board's Investigations and New York City Police Department's Implementation of the Board's Recommendations - FK25PAR200005

Deputy Comptroller Hayes-Chaffe:

The New York City Civilian Complaint Review Board (CCRB or Agency) offers the following comments on the findings and recommendations in the Draft Report for the Audit of the Timeliness of Civilian Complaint Review Board's Investigations and New York City Police Department's Implementation of the Board's Recommendations, dated December 8, 2025. The Agency thanks the audit team for its time and review of the CCRB's investigative processes. The CCRB is committed to achieving its mission to conduct fair, thorough, and impartial investigations of allegations of police misconduct against civilians, fostering transparency, and strengthening the public's trust in its oversight of the New York City Police Department (NYPD). The CCRB acknowledges the work of its investigative staff who have continued to conduct quality investigations despite budgetary challenges and marked increases in the number of complaints received by the Agency.

COMMENTS ON DRAFT REPORT

Causes of Delay:

The draft report states that, "CCRB's timelines may have been extended by CCRB delays in requesting and collecting documentation from the NYPD," and concludes that, "on average, it took CCRB 185 days (six months) to request and collect evidentiary materials from NYPD." This 185-day figure, however, appears to take the date of requests for a member of service's Summary of Employment History (SEH) into account, although SEH's are not requested until the end of the investigation when the case is ready for review by the Board. Member of service SEH's are subject to change. Requesting them at a later juncture

helps to ensure that the Board has up-to-date employment history when it reviews a case. The inclusion of SEH requests unduly inflates the calculation of the amount of time it takes the CCRB to request and receive evidentiary materials that are relevant to the allegations under investigation.

Joint Recommendations for the CCRB and the NYPD:

The CCRB will continue to work with the NYPD to improve investigation times and the implementation of recommended outcomes. The agencies will discuss whether the formal agreements recommended in the draft report can be implemented.

Recommendations for the CCRB:

Recommendation 1 – The CCRB already has investigative timeframes in place. The agency will consider whether additional timeframes are feasible given the complexities of its investigations, which are not always compatible with strict timeframes.

Recommendation 2 – The CCRB has already implemented this recommendation and will continue to seek additional funding.

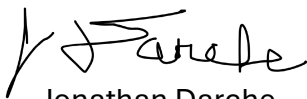
Recommendation 3 – The CCRB would benefit from a clearer explanation of the meaning of this recommendation.

Recommendations for Appointing Authorities and the City:

The CCRB has no comment on these recommendations.

The CCRB acknowledges the effort involved in conducting this audit and welcomes the opportunity to improve the efficiency and effectiveness of its investigations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Darche', written in a cursive style.

Jonathan Darche
Executive Director, CCRB



POLICE DEPARTMENT

December 19, 2025

Brad Lander
NYC Comptroller
Office of the New York City Comptroller
One Centre Street
New York, NY 10007

Maura Hayes-Chaffe
Deputy Comptroller for Audit
Office of the New York City Comptroller
One Centre Street
New York, NY 10007

RE: RESPONSE TO THE AUDIT ON THE TIMELINESS OF CIVILIAN COMPLAINT REVIEW BOARD'S INVESTIGATION AND NEW YORK CITY POLICE DEPARTMENT'S IMPLEMENTATION OF THE BOARD'S RECOMMENDATIONS

Dear Comptroller Lander and Deputy Comptroller Hayes-Chaffe:

The NYPD appreciates the opportunity to review and respond to the draft audit report concerning the disciplinary process for substantiated CCRB cases. We recognize the importance of the audit and the work invested in its preparation. At the same time, we have identified a number of substantive errors and methodological deficiencies in the report. We describe and address those errors below.

Disciplinary Matrix

On page 5, the report describes how CCRB has incorporated the Disciplinary Matrix into its Complaint Tracking System (CTS) and then uses that system to take the sum of the penalties for each substantiated allegation to arrive at an overall penalty value. But the report fails to acknowledge, let alone discuss, the fundamental flaw in this approach. The Disciplinary Matrix provides a nuanced, context-specific framework for when penalties should be concurrent and when they should be consecutive. CCRB's

process, as described in the report, seems to automatically make penalties consecutive. To the extent that is the case, it is contrary to the Disciplinary Matrix and fundamentally inconsistent with a fair, rational disciplinary system. It is important that the report discuss this issue, particularly when it is criticizing the Department for departing from the discipline recommended by the CCRB.

Charges Cases

The discussion regarding charges cases on page 7 is incomplete. After CCRB recommends that Charges and Specifications be served upon a member of service, the Administrative Prosecution Unit (APU) drafts the Charges and Specifications and the Department Advocate's Office (DAO) facilitates their service upon the member of service.

While the report accurately notes that cases retained by the Police Commissioner are handled by DAO, and that the Department may decide to pursue charges, impose lesser discipline, or take no disciplinary action, it fails to note that in matters with multiple allegations the Department may implement some combination of these options.

Misstating NYPD's "Non-Concurrence" with CCRB Recommendations

On page 19, the report has a section heading stating that the NYPD "Did Not Accept CCRB Recommended Discipline for More than 50% of Substantiated Non-Charges Cases." This is not accurate. As you know, the vast majority of cases in which the NYPD did not implement CCRB's recommendation were administratively closed because of the "Short SOL" policy, which is no longer in effect. When you exclude the short SOL cases, the Department only departed from the recommended discipline in 5% of non-charges cases.

Clarification Regarding DAO's Staffing and Case Processing

Per page 21, the draft report suggests that DAO lacked adequate staff dedicated to processing CCRB matters, which is inaccurate. DAO has attorneys and staff specifically assigned to manage CCRB cases, and all DAO attorneys are routinely called upon to assist with the processing of CCRB cases when needed. The Department's staffing model is intentionally adaptable, allowing resources to shift as necessary to maintain steady case processing and support broader organizational needs. While staffing fluctuations occur, as they do in any large organization, this has not prevented DAO from prioritizing CCRB matters or fulfilling its responsibilities. It is therefore inaccurate to conclude that DAO lacks sufficient resources for CCRB matters or that staffing levels are a primary factor affecting adjudication outcomes. Additionally, to suggest that at present the NYPD "does not review CCRB findings" and thereby "limits or eliminates the opportunity to resolve disciplinary issues" is simply not true. It is just the opposite: since March of this year, as directed by Commissioner Tisch, DAO has been reviewing all CCRB cases, irrespective of when they come to the Department in relation to the statute of limitations. The report should say so.

Terminology

The terminology used in Table 10 on page 23 should be corrected to avoid misstatement of cases status and disciplinary outcomes. For example, “Decision Pending by APU” would be more accurately described as “Cases Pending with APU,” as it is the case that is pending rather than a decision. Similarly, “Charges Served with Discipline” should be labeled as “Discipline Imposed” and cases involving members who have retired could appropriately be placed in separate category of “Other.”

NYPD Reporting to CCRB Regarding Disciplinary Action Taken

On pages 24-25, the report states that the Department has not reported on the disciplinary action taken against 140 members of service. This is not correct. In fact, 95 of the referenced cases have been reported to CCRB; 3 remain active and therefore are not subject to reporting; and the additional cases have not yet been reported. While the Department strives to provide expeditious and accurate reporting, we note that the currently unreported cases represent less than 3% of the closed cases cited in the audit.

NYPD Reporting to CCRB Regarding Penalties Imposed

On page 25, the report asserts that the Department did not report penalties imposed for 332 of the 909 (36.5%) cases for which the Department reported that disciplinary action was taken against MOS. This data is not accurate. In fact, a careful reading of CCRB’s own data shows that, as of August 22, 2025, the Department had reported the penalty outcomes for 307 of the 332 subject cases. Additionally, as of November 24, 2025, CCRB’s own data shows that the Department reported the penalty outcomes for an additional 14 of the subject 332 cases. The remaining 11 cases are, in fact, part of the group of cases for which the Department has not yet reported the disciplinary action taken, referred to in the paragraph above. Therefore, of the 332 cases identified in the report, the Department has yet to report to CCRB the penalty outcomes for **only 11 cases, not 332.**

Response to Recommendations:

The following outlines NYPD’s response to the recommendations in the report.

Joint NYPD/CCRB Recommendations One to Four

The NYPD will work collaboratively with CCRB leadership to review and address the four joint recommendations and evaluate current timelines, referral procedures, and information-sharing practices to determine what adjustments are practical for both agencies.

Recommendations Directed to NYPD

Recommendation One: The Department recognizes the value of clearer guidance when cases approach the statute of limitations and will review internally whether additional written procedures would be useful. Any decision to formalize guidance will reflect timing

requirements, operational practicality, and the legal standards governing the disciplinary process.

Recommendation Two: The Department will examine whether internal reference points or timelines would help reinforce existing practices.

Recommendation Three: The Department will continue to evaluate personnel needs within DAO, while ensuring that staffing decisions are consistent with the Department's organizational priorities and institutional obligations.

Recommendation Four: The Department will continue utilizing the Disciplinary Matrix, consistent with due process and the Police Commissioner's decision-making authority in disciplinary matters.

Recommendations Five: The Department will review whether internal policy adjustment would help clarify reporting practices and reinforce existing compliance obligations, while ensuring that any measures remain consistent with statutory protections.

Recommendation Six: The Department is already taking steps to improve documentation and reporting in connection with CCRB cases and will continue to do so.

Recommendation Seven: The Department has implemented a review of its current practices to verify that required information is communicated accurately in accordance with the law.

The NYPD appreciates the opportunity to review and respond to the draft report and respectfully requests that the above information and responses be incorporated into the final report.

Sincerely,



Kristine M. Ryan
Deputy Commissioner
Management & Budget

Cc: Kristina Milano, Director Fiscal Accountability Unit





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