

Assessing the Financial Impact of the Maryland Police Accountability Act



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1. Background

Maryland Police Accountability Act (PAA)

The 2021 Maryland Police Accountability Act (PAA) replaced the Law Enforcement Officer Bill of Rights (LEOBR) and significantly changed the state's police disciplinary process. The new law requires local governments to establish civilian oversight bodies—Police Accountability Boards (PAB) and Administrative Charging Committees (ACC)—and to implement processes to support these boards and ensure compliance.

PERF's Prior Police Accountability Act Findings

In November 2023, the Police Executive Research Forum (PERF) began assessing the impact of the PAA with funding from the Maryland Governor's Office of Crime Prevention and Policy (GOCPP).

The first phase of the assessment examined existing practices among PABs and law enforcement agencies to develop recommendations to increase compliance with PAA requirements and improve consistency statewide. The report on that phase, published in 2024, identified recommendations to reduce obstacles to PAA implementation, including clarifying vague statutory language and modifying impractical requirements that may hinder effective implementation of police accountability measures.[1]

The second phase aimed to quantify the PAA's effect on the handling of police misconduct cases and their outcomes compared to those under the LEOBR. The report, published in 2025, identified areas where the PAA may be improving accountability processes—for instance, through increased public transparency. But it also underscored the operational burdens the PAA places on both law enforcement agencies (LEAs) and ACCs—particularly in reviewing low-severity incidents and managing significant trial board backlogs—and recommended ways to alleviate these burdens.[2]

Throughout PERF's work in the previous phases of this project, law enforcement leaders expressed concerns that the PAA's requirements have had or may have serious financial consequences for their agencies. Trial boards, which agencies are responsible for administering, were frequently cited as the requirement with the greatest potential costs because of increased board requests, more investigator time, and the expenses associated with contracting administrative law judges.

1. PERF (Police Executive Research Forum), *Implementation of the Maryland Police Accountability Act (MPAA) of 2021* (Washington, DC: Police Executive Research Forum, 2024), https://www.policeforum.org/assets/MPAAImplementation.pdf.
2. PERF, *Measuring the Impact of the Maryland Police Accountability Act* (Washington, DC: Police Executive Research Forum, 2025), https://www.policeforum.org/assets/MPAA.pdf.

In addition, the PAA's broad definition of "police misconduct" has, in some jurisdictions, been interpreted to mean that minor departmental vehicle incidents involving a member of the public must be subject to ACC review, although what qualifies as "involving a member of the public" varies across jurisdictions (e.g., bumping a mailbox). Both LEAs and ACCs reported that the additional time required to investigate or review these minor "fender-bender" cases is unnecessarily burdensome.

Under the PAA, each county and the City of Baltimore is required to establish PABs and ACCs.[3] Many of these localities have allocated or must allocate funding to meet these requirements, for example, to support staff for PAB and ACC operations and to provide stipends to recruit and retain members. However, the legislation leaves budgetary decisions to local governing bodies, so the specific expenditures and total costs incurred vary widely across jurisdictions.

Purpose of Current Assessment

To evaluate the actual financial implications of PAA compliance, the current assessment was conducted with the following objectives:

- Inventory individual PAA-related line items and their associated costs.
- Assess the cost of minor department vehicle incident investigations under the PAA compared to LEOBR.
- Calculate the total cost incurred by a Maryland LEA or local government to comply with the PAA.
- Analyze the financial impact of implementing the PAA compared with the LEOBR.

2. Methodology

Information Campaign

Recognizing the importance of transparency and effective communication in recruiting Maryland LEAs to participate in this study, PERF's first objective was to conduct an information and outreach campaign. The campaign was designed to inform chiefs, sheriffs, and command staff about the study, clarify data requests, and outline the anticipated benefits of participation.

The campaign included four key activities:

1. A webinar providing detailed information on the prior two studies' recommendations and on this project's purpose, key activities, anticipated data requests, and expected deliverables. The webinar also gave agencies an opportunity to ask questions and provide input during the session or afterward via email.

3. The PAA also mandates a statewide ACC.

2. A brief presentation at a meeting of the Police Chiefs' Association of Prince George's County to increase awareness among the county's 29 municipal, county, and specialized police forces, as well as regional law enforcement partners.
3. Targeted email outreach conducted by the GOCPP and the Maryland Chiefs of Police and Sheriffs' Associations.
4. Ongoing phone and email communication between participating agencies and PERF staff to address questions and provide information as needed.

Agency Outreach and Participation

PERF invited 138 LEAs from across Maryland to participate, often conducting multiple follow-ups to encourage engagement in this data initiative. PERF and GOCPP also conducted targeted follow-up outreach and targeted outreach to specific agencies to promote participation and enhance representation across geographic regions and agency types.

Data Collection Tool Development

To systematically collect data on relevant costs of PAA compliance from participant agencies, PERF developed a structured data collection tool at the outset of the study. Development of the tool began with a review of the findings of the two previous PERF PAA reports to identify any activities or requirements that may incur costs. For example, in prior phases, some law enforcement leaders reported steep trial board–related costs, and several jurisdictions reported that PAB and/or ACC members received stipends for their work.

To determine whether these costs accurately reflected those commonly incurred by LEAs, identify additional expense categories, and better understand the financial impact of the PAA, PERF conducted interviews with representatives from four LEAs and one member of an ACC. The data collection tool was also reviewed and informed by input from staff of the Maryland Police Training and Standards Commission. The interview protocol is included as appendix A. Data from an ACC budget and a county attorney's office were also provided to PERF, offering additional insight into how some jurisdictions allocate costs across agencies.

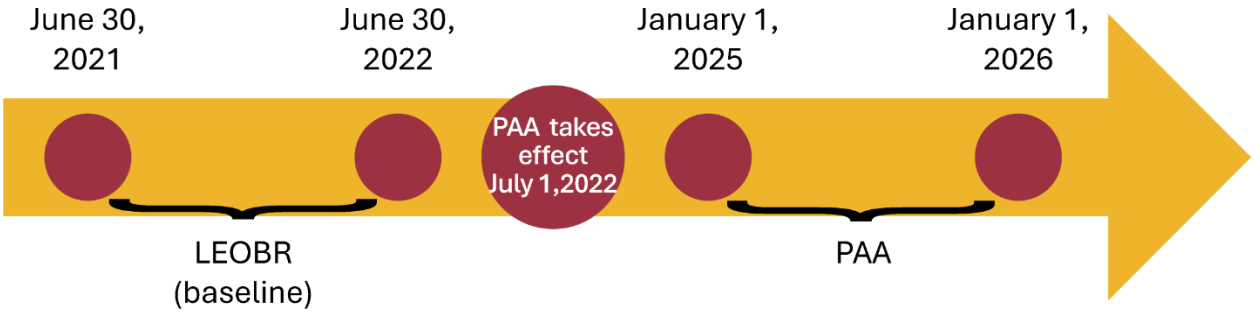
This information informed both the selection of cost categories and the design and format of the data collection tool.

Data Collection

Maryland LEAs were asked to complete a standardized spreadsheet detailing costs for specific line items and tasks related to PAA compliance. Agencies were permitted to add rows to capture any additional costs not explicitly listed. The spreadsheet, accompanying instructions document, and sample completed spreadsheet provided to guide respondents are included as appendix B. Data collection occurred between February and mid-May 2026.

PERF requested two years of data on the costs of handling police misconduct cases to enable comparison of the financial impact of the PAA and the prior LEOBR compliance. For LEOBR costs, agencies provided data for the one-year period prior to the PAA's effective start date, i.e., June 30, 2021, to June 30, 2022. For PAA costs, agencies provided data for the most recent one-year period under the PAA, i.e., January 1, 2025, to January 1, 2026, as shown in figure 1.

Figure 1. Comparison period timeline



Agencies that had no police misconduct cases during these periods were asked to provide data from the most recent years in which such cases occurred.

Among the agencies that supplied data, all noted that the cost figures—particularly those related to personnel time—reflect best estimates rather than precise measurements. These agencies, and several agencies that were ultimately unable to provide cost data, identified the following challenges in providing accurate cost information:

- They do not collect or track the requested data.
- Investigations are conducted by personnel across several ranks, with various salary levels.
- They do not track the number of hours spent on each case.
- Hours spent vary significantly depending on case complexity and severity.
- Length of trial boards differs widely.

PERF also reviewed publicly available budgets for the local governments overseeing the participating agencies to determine, where available, the funding allocated for PAA compliance—including PABs and ACCs.

Data Analysis

To conduct analyses of the data provided by participating LEAs, PERF created three comprehensive MS Excel spreadsheets designed to support distinct analytical objectives:

1. Assess impact of LEOBR versus PAA total costs on county/city and law enforcement agency budgets.
2. Compare LEOBR vs. PAA costs by line item and stage of the complaint process.
3. Examine LEOBR vs. PAA costs on a per-case basis.

Contextual Information

In addition to quantitative data, PERF received anecdotal information on the costs and financial impacts of PAA from many of the agencies that supplied data; this information provided valuable context. Because of the limitations discussed on page 4, some agencies were unable to provide any data; however, in conversations with PERF, they shared some of the expenses their agencies incurred and the overall financial impact of the PAA.

3. Findings

In total, 17 agencies participated. Fourteen agencies provided quantitative cost data to PERF for its assessment of the PAA's financial impact. One agency submitted a null (empty) dataset, as the unique circumstances of its single case under the PAA rendered the data unusable for the purposes of this report. Four agencies submitted partial data sets, meaning their cost data were subject to only some of the data analysis. In addition, three agencies provided contextual information through interviews with PERF staff.

The participating agencies ranged from small to large. Nine agencies were categorized as small (100 or fewer sworn officers); four as medium (101–999 sworn officers); and four as large (1000 or more sworn officers). The agency with the null dataset had fewer than 10 sworn officers.

Agencies represented 10 of Maryland's counties and a diverse mix of sizes (small, medium, and large), types (state, county, municipal, and university law enforcement agencies), and locations (rural, suburban, and mixed jurisdictions). Given the limited sample size and the significant variation in PAA implementation and budgeting across jurisdictions, the assessment findings should not be considered representative of all agencies or communities statewide.

Overall Costs

To better understand the broader financial impact of the PAA on Maryland communities, PERF also reviewed publicly available Fiscal Year 2022–2025 budgets for the 11 local governments under which the 13 participating law enforcement agencies operate. PERF reviewed consecutive years' budgets in this time frame to

- determine when localities began directing funding to PAA activities;
- assess whether the duration of PAA implementation impacted annual expenditures;
- gain a clear understanding of actual expenditures compared to proposed budgets.

The PAA legislation requires that a local governing body establish a PAB and an ACC; however, budgets to support these entities and PAA compliance are at the governing body's discretion. As a result, PAA funding allocations were inconsistent across localities. This made it challenging to accurately determine whether a local governing body allocated funding to support PAA-related activities.

Locality also affected which entity's budget (the government's, county attorney's office's, or police department's operating budget, etc.) covered specific PAA-related expenses, such as administrative law judges' fees for trial boards. It was not usually possible to discern in the locality's budget which entity was responsible for specific expenses.

Local Government Expenses

As shown in figure 2 on page 7, one locality spent nearly $1,000 in unbudgeted funds in FY22 to begin establishing PAA processes. Starting in FY23, six of the 11 governments' budgets directly allocated PAA funding annually in some capacity. One government directed funding from a GOCPP Police Accountability, Community, and Transparency Grant (PACT) to a law enforcement agency for training.[4] Five governments' budgets included annual funding for a PAB and an ACC.

In FY23, the lowest PAB and ACC budget PERF reviewed was $18,900, while the highest was $1,109,000; the median cost was almost $177,100. These costs ranged from less than 0.01 percent to 0.02 percent of the budgets. In the locality that provided a cost breakdown, the PAB's expenses were around $509,200, and the ACC's were almost $599,000.

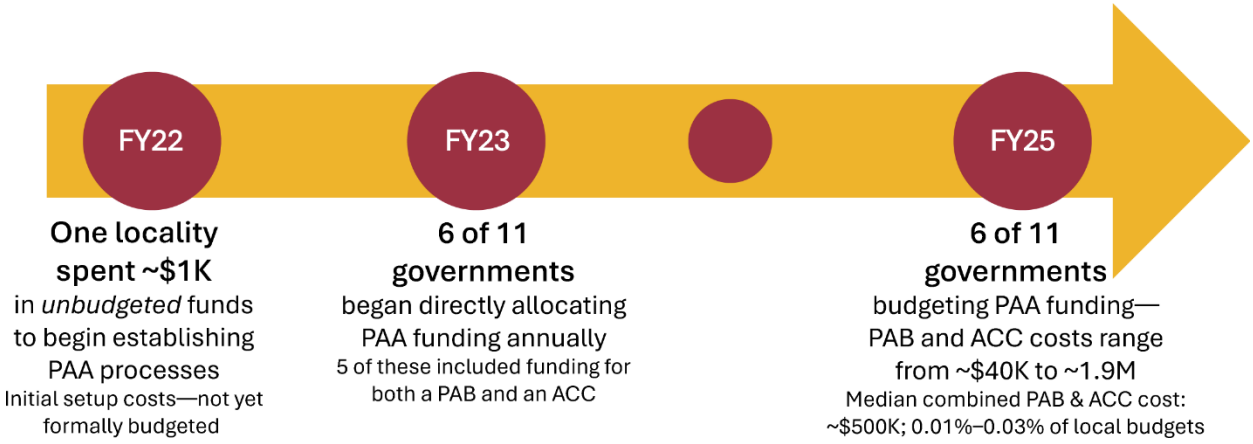
Budgets increased annually as localities frequently adjusted staff compensation and benefits; added or increased stipends for PAB, ACC, and trial board members; and identified additional costs, such as travel and professional membership fees, as they evaluated caseload and gained PAA implementation experience.

In FY24, the lowest PAA funding spent was $26,800, the highest was over $1,843,300, and the median was $256,000. These costs ranged from less than 0.01 percent to 0.03 percent of the budgets. In the locality that provided a cost breakdown, the PAB's expenses were around $927,300, and the ACC's were $916,000.

In FY25, one government spent slightly more than $42,200 on PAB and ACC expenses, while another government spent nearly $1,900,000. The median combined PAB and ACC costs were almost $500,000. These costs ranged from less than 0.01 percent to 0.03 percent of governments' overall budgets. Only one specified the funding amount for each: approximately $721,000 for the PAB and nearly $1,200,000 for the ACC. Two governing bodies directed PACT funds to law enforcement agencies in their localities, and one ACC received this grant directly.

4. GOCPP (Governor's Office of Crime Prevention and Policy), "Police Accountability, Community, and Transparency Grant (PACT)," accessed June 30, 2026, https://gocpp.maryland.gov/grants/programs/pact/.

Figure 2. PAA implementation timeline



Among local governments that did allocate funding for PAA compliance, how this funding was categorized, labeled, and broken down varied widely, making it challenging to identify the PAA activities it funded.

Most local governments included the funding in the budget's "general fund," but a few included it under the "special fund." Some local governments took the more formal path of establishing the PAB or ACC as entities with individually approved budgets that—in all cases—also covered the costs of their counterpart (ACC or PAB) and the trial board. Some governments' budgets included only a line item for the PAB or ACC. Others included one or both as cost line items in other offices' budgets—for example, the Chief Administrator Officer's or the County Attorney's Office's budget.

Still others lumped these funding allocations into broad expenditure line items, including "other criminal justice" and "non-departmental accounts." In one instance, a database search of archived expenditure documents for the relevant fiscal year and manual search of document titles for terms such as "police accountability board" and "administrative charging committee" were required to identify that PAB funding was allocated under one of these general categories.

In many cases, further review of separate documents was required to determine which expenses and entities were covered by funding allocations—if that information was possible to discover at all.

Law Enforcement Agency Expenses

Eleven agencies submitted full data sets for misconduct case–related costs under the LEOBR (June 30, 2021–June 30, 2022) and the PAA (January 1, 2025–January 1, 2026). One of these agencies submitted annual data for 2021 because it had no cases during the requested LEOBR period.

Case studies of the overall and individual costs incurred by three agencies are included:

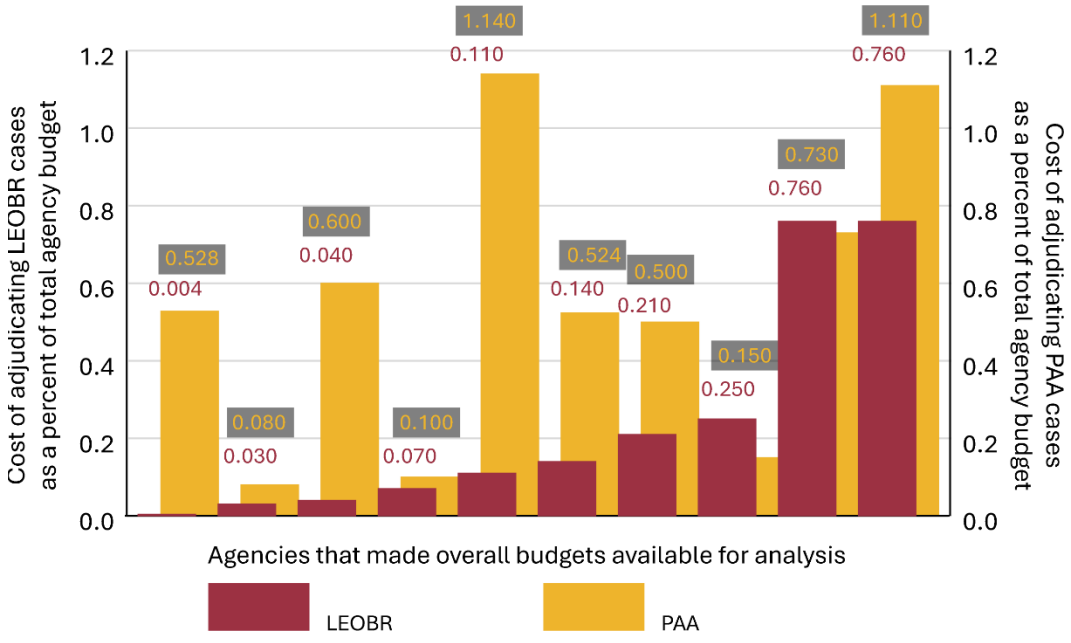
- Case Study 1. Large Agency
- Case Study 2. Medium Agency
- Case Study 3. Small Agency

As noted in the methodology, multiple factors affected agencies' ability to provide data: Agencies that do not track the data (including time spent on each case), time spent by personnel across ranks with varying salaries, and considerable variation in the durations of trial boards and personnel suspensions/desk duty. As a result, many agencies were unable to provide quantitative data, and participating agencies submitted best estimates and averages. Agencies' data sets were analyzed to

- calculate total PAA compliance costs incurred;
- compare total misconduct case–related costs under the LEOBR vs. PAA;
- assess the impact of PAA-related costs on the agency budget.

Ten of the 11 agencies made their overall budget available for the LEOBR and PAA periods. For eight of those 10 agencies, the total costs for adjudicating misconduct cases increased between the LEOBR and PAA periods at a steeper rate than the agency's overall budget. Consequently, these costs represented larger shares of the agencies' budget in the PAA period than in the LEOBR period (ranging from 1.22 to 18.63 times the prior proportion), with a median of 1.83. The two agencies that were exceptions had 86 percent and 17 percent fewer cases during the PAA period. The differences are shown in figure 3.

Figure 3. Cost of adjudicating cases as a percent of agencies' overall budgets



For 10 of the **11 agencies that submitted data, the overall cost of adjudicating misconduct cases during the PAA period was greater than during the LEOBR period (ranging from 1.25 to 20.81 times the cost), with a median of 2.07.** The only agency that incurred lower costs was a small agency (≤100 sworn officers) that had 86 percent fewer cases during the PAA period. See figure 3, which shows cost differences by agency, accounting for budget changes between periods.

Two agencies submitted only the costs they incurred under the PAA for new expenses, such as hiring additional personnel, ACC and PAB time costs, and technology purchases, with an average additional cost of around $424,000.

Overall Costs vs. Total Costs—What Is Included?

The following lists are not exhaustive.

Overall costs include the full amount spent on *all costs* associated with adjudicating police misconduct cases that involve a member of the public, such as the following:

- Investigative costs, including administrative work
- New personnel salaries
- Costs related to the Police Accountability Board requirements
- Costs related to the Administrative Charging Committee requirements
- Trial board costs
- Technology costs
- All other costs—legal counsel fees, salary for a victims' rights advocate, etc.

Total costs include all costs incurred in *one stage* of the adjudication process. For example, total trial board costs may include the following:

- IAD personnel time preparing for and presenting at the trial board
- Legal counsel time preparing for and presenting at the trial board
- Officer time serving on the trial board
- Administrative law judge fees

INVESTIGATION COSTS

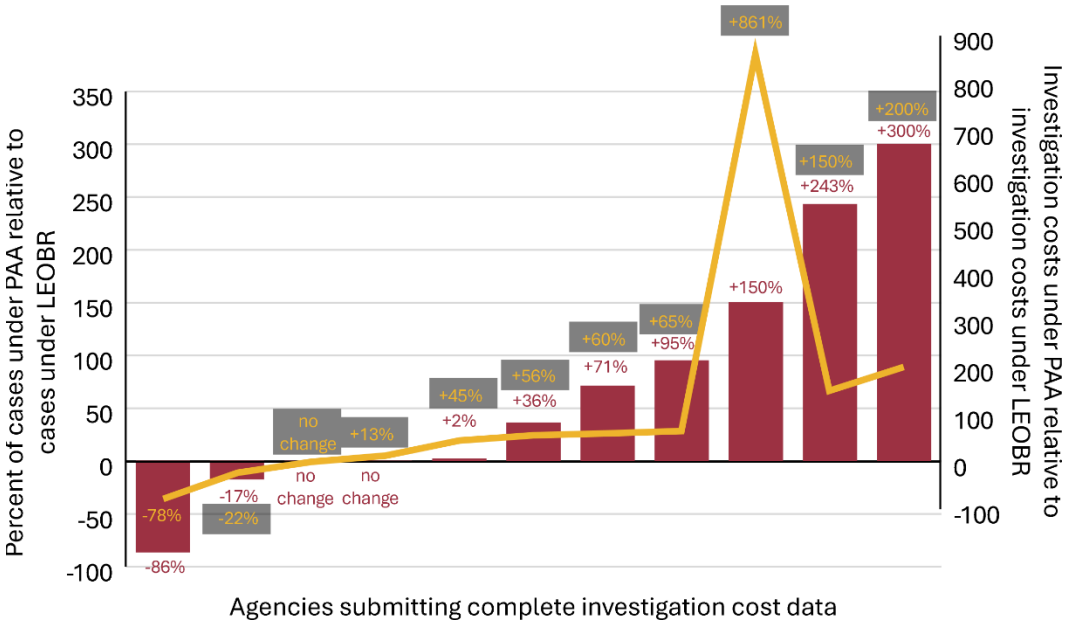
During the two previous phases of PERF's Measuring the Impact of the PAA initiative, law enforcement leaders expressed concern that PAA requirements had already increased or would increase investigative hours and therefore investigation costs. While the sample size for this assessment was limited and the findings are subject to the data limitations outlined on page 4, most participating agencies reported higher investigation costs under the PAA than under the LEOBR.

Investigation costs were first analyzed in terms of overall agency costs under LEOBR vs. PAA. Individual and total investigation costs were also calculated on a per-case basis, as agencies may have had different numbers of police misconduct cases during the requested data periods for the LEOBR and PAA, which may have affected overall investigation costs. To evaluate the financial impact of PERF's earlier finding that many jurisdictions interpret "misconduct" to include very minor departmental vehicle incidents, the time spent on these cases—both in total and per case—was also calculated separately from all other cases. One agency had no cases in the specified LEOBR time frame, so it submitted its 2021 annual data.

As shown in figure 4 on page 10, **among the 11 agencies that submitted complete investigation cost data, eight reported higher overall costs under the PAA than under the LEOBR, ranging from 13 percent to 861 percent higher. These eight agencies had between 2 percent and 300 percent**

as many total cases under the PAA as under the LEOBR. One agency's costs were the same under both. Two agencies had lower total investigation costs during the PAA period than during the LEOBR period, but they were the agencies that reported 86 percent and 17 percent fewer cases during the PAA period.

Figure 4. Changes in cases vs. changes in investigative costs from LEOBR to PAA



The representative for the agency that had 17 percent fewer reported cases emphasized that during the PAA period, the agency was still developing its case-tracking system in line with the new PAA misconduct classifications and requirements. Therefore, its case numbers were likely underreported, particularly for minor departmental vehicle accidents.

When calculating investigative costs per case (excluding departmental vehicle accident cases), seven of the 11 agencies reported higher personnel time costs under the PAA than under the LEOBR (ranging from 1.03 to 3.20 times higher). Four agencies spent the same amount on investigator time per case under both the LEOBR and the PAA.

Departmental Vehicle Accident Misconduct Case Investigation Costs

As PERF previously found and as several participating agencies restated, under the PAA, "misconduct" has widely been interpreted to include all departmental vehicle accidents involving a member of the public, regardless of level or severity, making them subject to ACC review. This interpretation of the definition of misconduct is backed by the nonbinding legal advice provided by the Maryland

Office of Counsel to the General Assembly in its publicly available letter dated April 18, 2023.[5] Previously, under the LEOBR, low-level vehicle-involved incidents were typically handled at the supervisor level. To assess the potential financial implications of this interpretation, the time spent on these cases was analyzed separately from that spent on all other misconduct cases.

Nine agencies submitted data on departmental vehicle accident misconduct cases. Departmental vehicle accident cases increased by approximately 2.17- and 2.23-fold for two large agencies and from 0 to 10 for a small agency. Departmental vehicle accident cases remained the same across the two agencies (1 and 6 cases); notably, their overall investigation costs increased by 900 percent and 66 percent, respectively. Four other agencies had decreases of 5–80 percent, with a median decrease of nearly 23 percent. However, one of these agencies incurred an 18 percent increase in overall costs. One of the agencies with fewer cases during this period noted that it was still developing its case-tracking system, particularly for vehicle misconduct cases; therefore, it noted its numbers were likely underreported.

The number of departmental vehicle accident cases investigated may have differed during the LEOBR and PAA data periods for many reasons. In addition, this assessment is based on data from a small number of agencies. So it is not possible to conclude at this time whether the PAA definition of "police misconduct" results in more or fewer departmental vehicle accidents being classified as misconduct than were classified that way under LEOBR.

Eight agencies had cases during both the LEOBR and PAA periods. **Five of the eight agencies incurred higher costs overall and per case during the PAA period. Their overall costs increased by 0.18 to 9 times more. Per case, four spent 1.66 to 4.87 times as much, and one spent 10 times as much.** Compared to under the LEOBR, time spent on cases under the PAA included both investigative time and time spent submitting cases to the ACC. Therefore, total hours spent per case increased for most agencies, with four agencies also using support personnel to assist in handling these cases.

One medium-sized agency reported having a full-time sergeant dedicated to departmental collisions. A large agency shared that they've hired two police assistants who deal with these cases and send all related information to the ACC. Their departmental vehicle accident misconduct cases had more than doubled, and they expressed their opinion that they had "upwards of 100 departmental accidents that wouldn't have been subject to discipline previously."

5. Sandra Benson Brantley, letter to the Honorable Michael A. Jackson, Senator, Maryland General Assembly, April 18, 2023.

Investigation Costs Summary

The quantitative and anecdotal information indicate that investigation time costs have increased under the PAA. However, these agency findings should be viewed in the context of the following data limitations:

- The sample size was small.
- Agencies do not track the hours spent on investigations.
- Data submitted for hours spent were estimates and averages, as agencies do not track hours spent on each investigation, and these vary by case.
- Three agencies provided data reflecting annual salary increases, which contributed a portion—but not all—of the observed increase between LEOBR and PAA costs for these agencies.

Six agencies reported reallocating staff, paying overtime, or hiring new staff to handle their agencies' expected increase or increase in investigative workload under the PAA. Three agencies noted that they had hired two to three new staff members, resulting in additional annual costs of approximately $229,000 to $387,000.

A representative for a medium-sized agency reported that, because of the increased Internal Affairs caseload under the PAA, they had to assign another lieutenant to oversee staff inspections and policy accreditations and that they should also hire a policy writer, a role previously overseen by the lieutenant who also supervised Internal Affairs. A small agency reported that it now has a dedicated sergeant who handles internal investigations, whereas the caseload was previously absorbed into the criminal investigation division's workload. However, one large agency reported they believe their investigators' workloads and associated salary costs have leveled off after being initially heavy when the PAA was implemented, as they didn't have to change many of their processes in response to the PAA.

POLICE ACCOUNTABILITY BOARD COSTS

Among the 13 agencies that submitted data sets, nine reported expenses associated with PAB activities, including staff time for submitting administrative reports ($42 to $170 per report) and preparing for and attending PAB meetings ($21 to $540 per meeting). Agencies varied widely in the number of reports submitted and meetings attended; however, **total PAB-related administrative expenses were generally low: the lowest cost was $120, and the median was $777, although one outlier agency spent $15,300.** Total costs were most impacted by whether agencies submitted reports and attended meetings on a scheduled basis or for every case.

One agency paid the PAB members' stipends, totaling $37,000 in 2025.

Administrative Charging Committee Costs

This section captures costs only for misconduct cases, excluding departmental vehicle collisions, as those costs were analyzed separately and are detailed in the subsection Departmental Vehicle Accident Misconduct Case Investigation Costs on page 10.

Twelve of the 13 agencies submitted costs for tasks related to the ACC. A few agencies reported attending ACC meetings around once a quarter, with immaterial associated costs. In pre-interviews, all agencies conveyed that they do not typically appear at ACC hearings and generally respond only to requests for additional information. Therefore, PERF requested data only on hourly costs for investigators and support personnel preparing cases for ACC review and responding to requests for information. Per case, the lowest cost was $32, the highest was $960, and the median was $75. Agencies' costs for preparing for ACC hearings and responding to information requests depended on the number of cases they handled, so total costs varied widely across agencies. **For time spent on ACC hearing tasks, the lowest total cost was $315, the highest was $52,000, and the median total cost was $2,276.**

The agency that paid the PAB members' stipends also paid the ACC members' stipends, for a total of $31,500 in 2025.

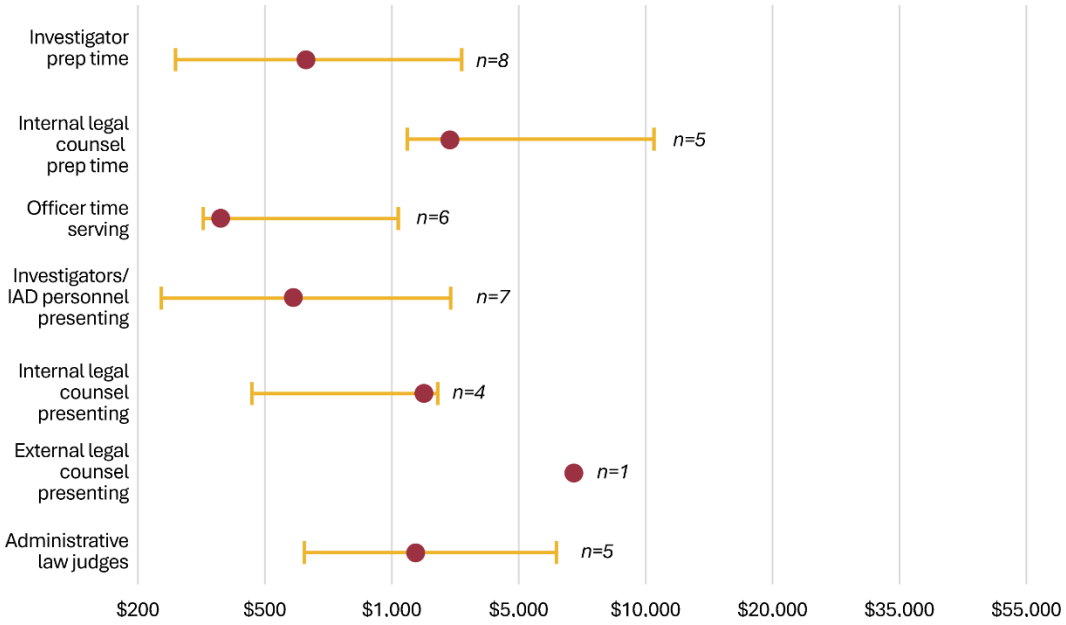
Trial Board Costs

PERF did not compare the costs of trial boards under the LEOBR vs. the PAA; it only calculated the cost of trial boards for an agency under the PAA. Eight agencies submitted all costs they had incurred for trial boards during the PAA period. One agency submitted costs for a trial board prepared for that was settled before the hearing. These data sets were analyzed to

- calculate the total cost incurred by each agency for trial boards;
- calculate the average cost for each trial board;
- assess the costs for individual line items related to trial boards.

For the eight agencies that submitted all costs, as shown in figure 5 on page 14, **the lowest amount incurred by an agency for trial boards was around $1,560; the highest was $52,300; the median was $20,385. Per trial board, the lowest cost paid by an agency was $330, the highest was $13,400, and the median cost per trial board was $6,810.**

Figure 5. Inventory of costs per trial board



Trial board costs were a category in which each law enforcement agency's costs varied widely because of several factors. Larger agencies had more cases, which contributed to higher total costs. However, several agencies with the highest case numbers did not have the highest total costs. So agency size and number of cases were not the ultimate factors in determining total costs. One factor was which entity was responsible for which trial board expenses—the County Attorney's Office, Office of Law, PAB/ACC (if funded), etc. For example, the County Attorney's Office or the Office of Law often provided—and therefore covered costs for—external legal counsel representing law enforcement agencies at trial boards. In addition, officers subject to complaint were sometimes represented by legal counsel provided by the Fraternal Order of Police. Only one law enforcement agency paid for external legal counsel by a private law firm.

The total trial board costs reported here are likely to be underestimated. Many participating agencies had trial boards pending, sometimes in considerable numbers. So a case's data related to investigation, PAB, and ACC costs may have been submitted even if the data for the case's trial board costs were not. As with most other categories, the number of cases that proceeded to this step in the misconduct review process significantly affected the total costs incurred by an agency in this category and overall.

Data on the number of trial boards held under the PAA vs. LEOBR are insufficient to quantitatively answer whether more officers requested trial boards under the PAA than LEOBR. However, according to participating agencies and law enforcement leaders who participated in PERF's second

report,[6] **trial board backlogs are, in large part, a result of the significant increase in the number of trial board hearings requested by officers accused of misconduct under the PAA compared with the LEOBR.** The financial implications of trial board backlogs are explored on page 16.

Throughout PERF's study of the PAA's implementation, law enforcement leaders have expressed concerns about the costs of trial boards. PERF did not compare the costs of trial boards under the LEOBR vs. the PAA; it only calculated the cost of trial boards for an agency under the PAA. However, the PAA's legislative requirement to include a civilian and an administrative law judge/retired district or circuit court judge added costs to this process.

A representative from a prosecuting attorney's office said they have also experienced a significant increase in cases and a backlog in trial boards. They stated, **"There is no doubt that the new law has been costly compared to under the LEOBR. There are a lot of requests for boards, which means more costs than under LEOBR and agency policy. Previously, a minor policy violation would typically result in a counseling recommendation. Now officers want their time in front of the board."** The increase in caseload led to the hiring of another attorney and an additional staff member to liaise with the ACC.

Technology Costs

Eight agencies submitted cost data for technology and other equipment needed to comply with the PAA requirements. The most frequently reported costs, as shown in table 1, were user licenses for the IAPro® system and BlueTeam® add-on, which support the standardization and oversight of documentation and investigations of use-of-force incidents, pursuits, and complaints of misconduct.[7] The second-most common costs were for public portals that provide notifications to complainants throughout the process.

Table 1. Technology costs

Description	# of agencies with cost data	Time period	Lowest agency cost	Highest agency cost	Median cost
IA Pro & BlueTeam	7	Annual	$3,371	$11,000	$7,083
Public Portal	4	Annual	$5,510	$24,000	$16,023
Veritext Transcription*	1	1 month			$2,112
EIPro® (Early Identification Software)†	1	Annual			$40,604
Database	1	Annual			$130

* "Reporting Excellence," Veritext, accessed June 30, 2026, https://www.veritext.com/reporting-excellence/.
† "Versaterm EIPro," Versaterm, accessed May 22, 2026, https://www.versaterm.com/solution/eipro/.

6. PERF, *Measuring the Impact* (see note 2).
7. "Versaterm IAPro," Versaterm, accessed May 22, 2026, https://www.versaterm.com/solution/iapro/; "Versaterm BlueTeam," Versaterm, accessed May 22, 2026, https://www.versaterm.com/solution/blueteam/.

OTHER COSTS

The "Other Costs" section of the standardized data collection spreadsheet captured costs incurred under the LEOBR and the PAA that were not associated with any one phase of the police misconduct adjudication process. As with other cost sections, law enforcement agencies could also add rows for any additional line-item costs not explicitly listed.

PERF analyzed the agencies' "Other Costs" data to

- calculate total "other" costs under the LEOBR;
- calculate total "other" costs under the PAA;
- compare total "other" expenses under the LEOBR vs. PAA.

Internal Legal Counsel

Seven agencies included costs for internal legal counsel; of these, three paid higher costs (not attributable to salary increases) during the PAA period than during the LEOBR period. Two agencies had not paid for internal legal counsel under the LEOBR but paid $600 and $2,940 in salary costs for advice on police misconduct matters during the PAA period. One agency had previously paid for one full-time attorney under the LEOBR. However, the implementation of the PAA led to an increase in trial boards, resulting in higher union legal fees and the addition of a part-time attorney, for a total additional cost of $63,000 for their agency in 2025.

Paying Officers Subject to Complaint (While Suspended or on Desk Duty)

Officers received pay while suspended or on desk duty under both the PAA and the LEOBR, pending final case outcomes. **However, cost differences between the LEOBR and PAA periods were considerable because of changes in the adjudication process, which affected the number of requests for trial boards and decision appeals, as well as the time delays before final outcomes.**

Seven agencies included costs for paying personnel across ranks who were the subject of complaints and were suspended or placed on desk duty while awaiting final case outcomes. All seven incurred greater costs during the PAA period. Four agencies had one or two personnel suspended or placed on desk duty during the PAA period for varying lengths of time, but none had such suspensions during the LEOBR period, resulting in added costs ranging from $16,999 to $354,228. Two agencies had one or two more personnel suspended or placed on desk duty during the PAA period than during the LEOBR period, for varying lengths of time, resulting in increased costs of $61,313 and $282,138.

As a result of significant variation in suspension or desk-duty lengths for personnel and the agency's high caseload, one agency was unable to provide its total costs for this line item under the LEOBR vs. the PAA. However, personnel suspensions and desk duty placements increased significantly during the PAA period (175) compared to during the LEOBR period (107), resulting in the agency spending $149,600 more per week.

Several agency representatives said it is taking longer, on average, for final disciplinary decisions to be made under the new PAA adjudication processes. They said this has had serious financial implications for their agencies. Several agencies reported having personnel suspended or on desk duty for more than a year while awaiting a trial board hearing, because of the backlogs described in the "Trial Board Costs" section on page 14. One agency stated that several personnel had appealed trial board termination decisions within 30 days. Under the LEOBR, they would receive back pay only if they won the appeal. However, under the PAA, the agency had to pay their full salaries for more than a year—until the circuit court upheld the termination decision.

Victims' Rights Advocate Costs

The PAA requires that LEAs "designate an employee as a victims' rights advocate to act as the contact for the public within the agency on matters related to police misconduct."[8] Some participating agencies included this responsibility in investigators' duties. Five agencies assigned a victims' rights advocate, part-time or full-time, depending on caseload, to police misconduct cases involving a member of the public. **Costs for advocates' time ranged from nearly $2,000 to nearly $80,000, with a median of almost $50,000.**

8. Maryland Public Safety Article §3-108(a)(2) (2021), https://mgaleg.maryland.gov/mgawebsite/Laws/StatuteText?article=gps&section=3-108.

CONCLUSION

The findings based on the data PERF obtained are organized according to the four objectives outlined in the "Purpose of Current Assessment" section on page 2. Data limitations are outlined on page 4.

Objective 1. *Inventory individual PAA-related line items and their associated costs.*

An inventory of costs that any participating LEA reported paying to comply with the PAA requirements is included in the "Cost Inventory and Budgeting Tool" section starting on page 41.

The individual line-item costs each agency paid were most affected by their local government's budgetary decisions about which entity was responsible for specific expenses. For example, whether the agency or the local government paid for costs such as the administrative law judge serving on trial boards. The funding that local governments allocated to PAA compliance, and therefore what they covered, varied widely between jurisdictions. The challenges associated with identifying government funding allocations to PAA activities are described further in the Overall Costs section beginning on page 5.

Objective 2. *Assess the cost of minor departmental vehicle incident investigations (involving a member of the public) under the PAA compared to LEOBR.*

Across all three PERF studies,[9] participating agencies consistently reported that the number of minor departmental vehicle incidents classified as misconduct has increased substantially under the PAA. This increase is largely attributable to the PAA's broad definition of misconduct, which has been widely interpreted to include all departmental vehicle incidents involving a member of the public, regardless of severity.

Agency representatives frequently described the resulting caseload and associated ACC review requirements as administratively burdensome and potentially costly. **To manage the increased workload, four agencies added staff.** These included a medium agency (101–999 sworn officers) that assigned a full-time sergeant to collision investigations and a large agency that hired two police assistants exclusively to handle these cases.

The quantitative data are mixed but generally indicate increased workload and costs under the PAA. PERF's second report found that allegations related to agency vehicle incidents increased by 289 percent between the LEOBR and PAA periods across the agencies studied**. In the current assessment, departmental vehicle accident misconduct cases increased substantially for some agencies—by 117 percent and 123 percent for two large agencies (1000+ sworn officers) and rising from 0 to 10 cases for a small agency (≤100 sworn officers).** In contrast, case numbers remained unchanged in two agencies and decreased by 5 to 80 percent (a median decrease of approximately 23 percent) in four others. However, one agency reporting fewer cases said its figures were likely underreported because its case tracking system was still being implemented during part

9. PERF, *Implementation of the MPAA* (see note 1); PERF, *Measuring the Impact* (see note 2)

of the PAA reporting period. **Notably, the two agencies with unchanged case volumes and one agency with fewer cases nevertheless experienced higher total costs, ranging from 18 percent to 900 percent above LEOBR-period levels, because of increased investigative and administrative time spent adjudicating cases and otherwise complying with the PAA.**

Cost data show a clearer upward trend. **Five of the eight agencies with vehicle misconduct cases during both the LEOBR and PAA periods experienced increases in both total and per-case costs under the PAA. Total costs rose by between 3.46 and 9 times prior LEOBR levels. On a per-case basis, four agencies spent between 1.66 and 4 times as much, while one agency spent 10 times as much during the LEOBR period.** These cost increases were driven primarily by the additional administrative work required to submit cases to the ACC, combined with higher investigative time requirements in many cases.

Objective 3. *Calculate the total cost incurred by a Maryland LEA or local government to comply with the PAA.*

Based on the data provided, for participating law enforcement agencies, the highest overall cost for adjudicating misconduct cases during the PAA period was around $3,300,000, the median was $115,300, and the lowest was $8,100. Costs incurred by agencies were affected by numerous factors, including case volume, investigation time costs, time spent on administrative tasks to comply with the PAA, and costs for hiring new personnel. Another contributing factor was which expenses their local governing body paid for through its or other entities' budgets, such as PAB, ACC, and trial board costs.

The PAA legislation requires a local governing body to establish a PAB and an ACC; however, budgets for supporting these entities and for PAA compliance are at the governing body's discretion. As a result, PAA funding allocations were highly inconsistent across localities. In some cases, it was difficult to determine whether any funding was allocated.

Among local governments that did allocate funding, the way it was categorized, labeled, and broken down varied widely, making it hard to determine what the funding covered. In FY 25, the lowest amount allocated for PAB and ACC expenses by a local government was around $42,200; the highest was nearly $1,900,000; and the median was almost $500,000.

Objective 4. *Analyze the financial impact of implementing the PAA compared with the LEOBR.*

All 13 agencies that provided cost data incurred higher costs during the PAA period than during the LEOBR period when adjusting for case numbers. All four agencies that provided only contextual, anecdotal information believed that they had incurred higher expenses under the PAA than under LEOBR. While the data had limitations, this finding is consistent with data and statements PERF found during the past three years, which indicated increased costs under the PAA.

Depending on the agency, cost increases between the periods were significantly affected by

- higher number of misconduct cases;
- greater investigative and administrative time costs per case;
- added or increased trial board costs.

Eleven of the 13 agencies submitted the number of misconduct cases they had during the LEOBR vs. PAA periods. Seven agencies had 1.02 to 4 times as many total cases during the PAA period, with a median of 1.95 times as many.

For 10 of the **11 agencies that submitted data, the overall cost of adjudicating misconduct cases during the PAA period was greater than during the LEOBR period** (ranging from 1.25 to 20.81 times the cost, with a median of 2.07). The only agency that incurred lower costs was a small agency (≤100 sworn officers) that had 86 percent fewer cases during the PAA period.

Of these 11 agencies, **seven reported higher investigator time costs per case (excluding departmental vehicle accident cases) under the PAA than under the LEOBR** (ranging from 1.03 to 3.2 times more per case). Five of the eight agencies that had departmental vehicle accident cases during the LEOBR and the PAA periods had greater investigative and administrative costs per case during the PAA (ranging from 1.66 to 10 times more per case).

Across all three PERF studies,[10] participating agencies consistently reported more requests and therefore higher trial board hearing costs. In addition, many participating agencies had trial boards pending, resulting in underestimated costs. Law enforcement officials also frequently raised these concerns during PERF's prior studies.

Additional cost increases were affected by

- time spent on PAB and ACC processes;
- new technology purchases;
- other additional costs.

LOOKING AHEAD

As stressed throughout this report, the findings in this assessment should be interpreted with appropriate caution. The participating agencies do not constitute a representative sample of all Maryland law enforcement agencies, and many of the costs reported were, by necessity, estimates rather than precise measurements. PERF cannot therefore draw sweeping statewide conclusions about the exact financial impact of the PAA.

However, the evidence gathered through this assessment overwhelmingly pointed in a single direction. Across participating agencies of different sizes, types, and jurisdictions, the PAA was associated with substantially higher costs than the LEOBR. In most participating agencies, misconduct

10. PERF, *Implementation of the MPAA* (see note 1); PERF, *Measuring the Impact* (see note 2)

investigations required more personnel time, administrative obligations increased, trial board costs grew, and additional expenses were needed to cover staffing, technology, and overall compliance. And while the cost of those activities varied considerably across the agencies PERF examined, the overall pattern was consistent: the PAA was more expensive.

Yet higher costs alone do not necessarily indicate a problem. Lawmakers could reasonably conclude that enhanced accountability, greater transparency, and civilian participation justify greater expenditures. The critical question, therefore, is not just whether the PAA costs more than the LEOBR, but whether those additional costs are producing commensurate public benefits in the form of greater accountability.

PERF's prior examination of disciplinary outcomes post-PAA raises important questions. In a prior report that examined cases, outcomes, and timelines, PERF found that among participating agencies, there was an overall increase of about 5 percent in the number of misconduct allegations between LEOBR and PAA, which included a **289 percent increase** in agency vehicle–related incidents that required formal investigation. While that assessment found that the PAA increased transparency, it did not find evidence that the new framework resulted in enhanced discipline,[11] even as agencies reported increased workloads, more complex processes, and growing trial board backlogs. Taken together, the findings from these assessments suggest that Maryland's police accountability system may now require significantly greater public expenditures while yielding uncertain gains in disciplinary accountability.

These outcomes may reflect temporary implementation challenges or the unintended consequences of a new statute. However, after three years of examining the implementation, operation, and financial impact of the PAA, one question warrants continued examination: Is the PAA delivering the level of accountability that justified its creation? And if not, what changes might be necessary to better align its costs with its intended results?

CASE STUDIES

To provide insight into how multiple factors affect an individual agency's overall costs of adjudicating police misconduct cases and the total costs at each stage of the process, PERF conducted three case studies. The case studies assess the expenses incurred by a large agency (1000+ sworn officers), a medium agency (101–999 sworn officers), and a small agency (≤100 sworn officers).

11. However, as noted in that report, there were outstanding trial boards that made drawing definitive conclusions impossible.

CASE STUDY 1. LARGE AGENCY

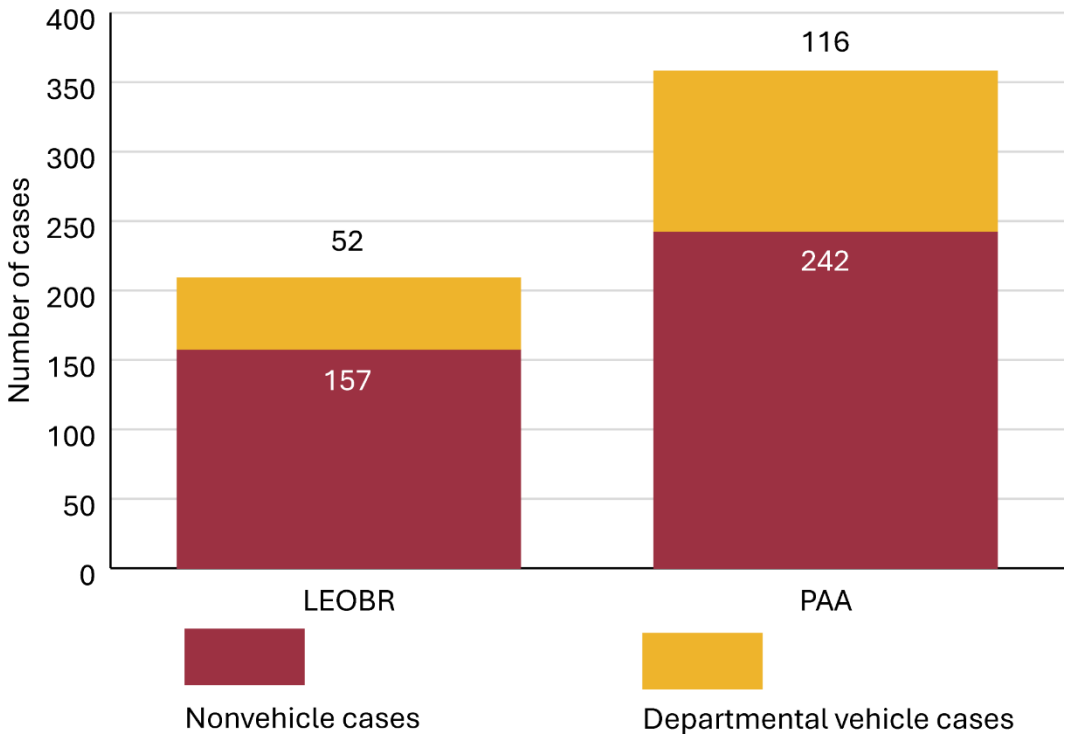
Law Enforcement Agency Costs

This large law enforcement agency (defined as having more than 1,000 sworn officers) spent an estimated $2,000,000 adjudicating police misconduct cases during the LEOBR data period (June 31, 2021–June 31, 2022), compared to an estimated $3,300,000 during the PAA data period (January 1, 2025–January 1, 2026).

Although the agency's overall budget increased between the LEOBR and PAA periods, the total costs associated with adjudicating misconduct cases grew at a greater rate. Consequently, these costs represented a larger share of the agency's overall budget in the PAA period—**specifically 1.48 times the proportion observed during the LEOBR period.**

While the increase in costs cannot be attributed solely to case volume, the higher number of misconduct cases during the PAA period was likely an important contributing factor. The agency recorded 358 total misconduct cases during the PAA period, compared to 209 cases during the LEOBR period—representing a 1.71-fold increase, as shown in figure 6.

Figure 6. Large agency LEOBR vs. PAA total cases



Under the LEOBR, there were 157 misconduct cases (excluding departmental vehicle accident misconduct cases), compared to 242 cases under the PAA—representing a 1.54-fold increase during the latter period. The number of departmental vehicle accident misconduct cases experienced the steepest growth, increasing by a factor of 2.23, from 52 cases under LEOBR to 116 cases under the PAA, as also shown in figure 6.

Many factors contribute to the total number of misconduct cases in a given year. Agency representatives said it is "impossible to gauge how many of these (the reported) cases would have existed pre-ACC." However, they noted that the total number of misconduct cases is likely higher under the PAA because all complaints must now be referred to the ACC, including matters that previously would have been handled at the command level (e.g., by an officer's captain).

With respect to the increase in departmental vehicle misconduct cases, representatives observed that there were "upwards of 100 departmental vehicle accidents that wouldn't have been subject to discipline" under the LEOBR. Under the PAA, however, these incidents are more frequently classified as misconduct and are therefore subject to ACC review.

More broadly, agency representatives expressed the view that the adjudication process is inherently more costly under the PAA because of the addition of new procedural components—specifically, the ACC and the PAB—each of which carries associated administrative and operational costs not present under LEOBR.

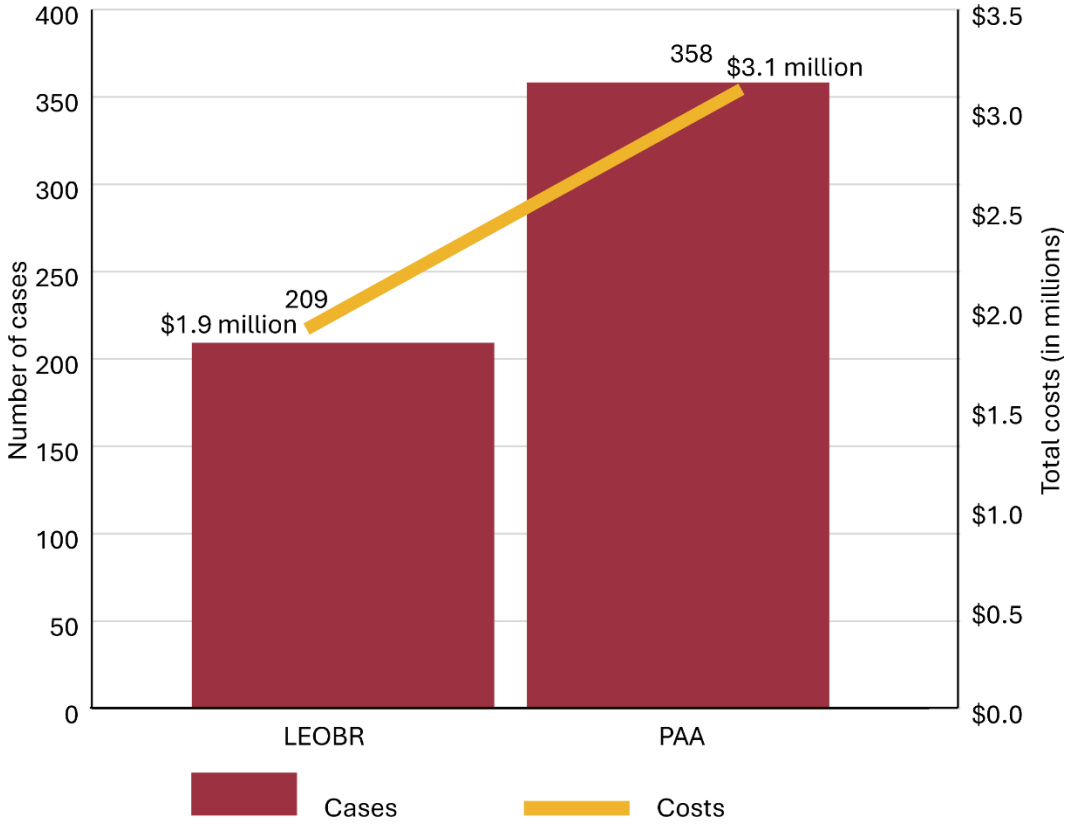
Local Government Costs

PERF reviewed publicly available Fiscal Year 2022–2025 budgets for the local government under which the law enforcement agency operates. According to the government's Annual Comprehensive Financial Reports for fiscal years ending June 30, 2023 and June 30, 2024—as well as the PAB and Police Trial Board report for fiscal year 2025—appropriations for the PAB were considered "immaterial to the basic financial statements taken as a whole."

Investigation Costs

As shown in figure 7 on page 24, total investigation costs were approximately $3,100,000 during the PAA data period, compared with approximately $1,900,000 during the LEOBR period. While this increase must be considered in the context of the approximately 71 percent increase in the number of cases between the two periods, the higher cost per investigation likely also contributed to the roughly 60 percent increase in total investigation costs.

Figure 7. Large agency LEOBR vs. PAA estimated total costs relative to case numbers



Agency representatives said investigators' workloads—and associated salary costs—have begun to level off after caseloads were initially heavy following the PAA's implementation on July 1, 2023. They noted that the department did not need to substantially modify its investigative process in response to the PAA.

For non–departmental vehicle misconduct cases, the average number of investigator hours per case increased slightly during the PAA period (January 1, 2025–January 1, 2026) compared to the LEOBR period (June 31, 2021–June 31, 2022). This difference resulted in an estimated investigation cost per case of approximately $12,700 under the PAA, compared to $12,300 under LEOBR.

However, departmental vehicle accident cases drove a greater increase in investigation costs. Because of the expanded classification of these incidents as misconduct (when they involved a member of the public), the agency hired two police assistants whose sole responsibility is to document these cases and forward them to the ACC. For these cases, investigators reported that the time required per case approximately doubled, and—when combined with the added workload of the assistants—total staff time increased substantially. As a result, the estimated investigation cost per departmental vehicle accident misconduct case rose to approximately $297 under the PAA from about $61 under the LEOBR—a nearly fivefold increase.

Police Accountability Board Costs

The PAB represents an additional component of the police misconduct oversight process under the PAA and entails associated costs.

The law enforcement agency incurred minimal personnel costs for staff time spent preparing for and attending three PAB meetings in 2025, totaling approximately $509. The agency noted that it submits all investigative reports directly to the ACC; therefore, it did not report any additional costs associated with preparing or submitting materials specifically for PAB review.

The agency's locality does not allocate funds in its budget for PAB member stipends. As a result, this expense is borne directly by the law enforcement agency. In 2025, stipend payments to PAB members totaled approximately $37,000.

Administrative Charging Committee Costs

Consistent with feedback from agencies that participated in interviews, agency representatives said they do not typically appear at ACC hearings and generally respond only to requests for additional information. As a result, the agency reported limited personnel costs associated with the ACC, consisting primarily of investigators' time spent preparing misconduct cases (excluding departmental vehicle accident cases) and responding to follow-up inquiries. These costs totaled approximately $6,900 across cases in 2025.

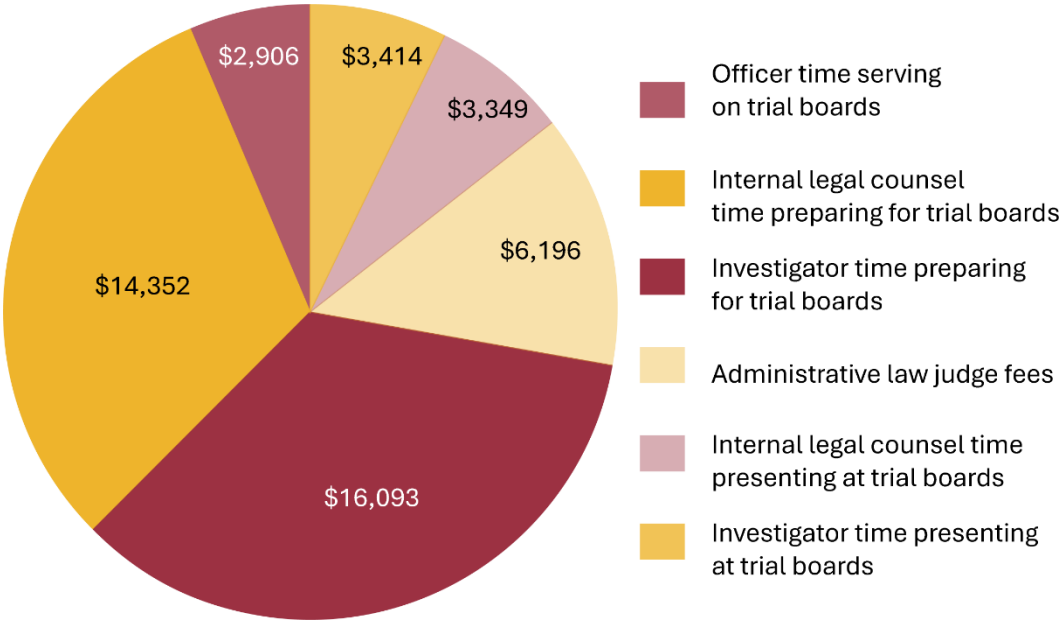
The agency's locality does not allocate funding in its budget for ACC member stipends. Consequently, this expense is borne directly by the law enforcement agency. In 2025, stipends for ACC members totaled approximately $31,500.

Trial Board Costs

During the PAA period, estimated total trial board costs were approximately $46,300, compared to about $12,700 during the LEOBR period. On a per-case basis, this difference reflects an increase from roughly $4,200 per case under LEOBR to approximately $5,000 per case under the PAA.

A portion of this increase is attributable to approximately $6,200 in fees paid during the PAA period to administrative law judges, as shown in figure 8 on page 26. These costs reflect the statutory requirement that an active or retired administrative law judge or district/circuit court judge serve on the trial board.

Figure 8. Large agency PAA trial board costs (total estimated cost $46,310)



Agency representatives said trial boards do not require significantly more time from investigators or internal legal counsel on a per-case basis under the PAA than the prior LEOBR system, as the process is structured similarly. As a result, the agency does not incur additional personnel costs associated with staff time. In addition, when the agency does not recommend discipline but the ACC does, an attorney from the Office of Law represents the department at no cost to the agency.

Instead, the primary driver of increased trial board costs appeared to be the greater proportion of cases proceeding to trial boards under the PAA than under LEOBR. During the PAA period, 3.31 percent of non–departmental vehicle cases were referred to a trial board, compared with 1.9 percent during the LEOBR period. While not all trial boards involved cases in which the ACC recommended termination, agency representatives noted their belief that termination cases have increased under the PAA. They said further that such cases almost always proceed to a trial board, although some are resolved prior to a formal hearing.

The agency also noted that the reported total trial board costs for the PAA period likely understate the full cost burden, as six trial boards remain pending. This statement reflects a broader concern identified by many agency leaders participating in this assessment, as well as in PERF's second study:[12] A large number of agencies are experiencing backlogs or pending trial boards, in some cases quite substantial.

Although available data are insufficient to conclusively determine whether officers are requesting trial boards at comparable rates under the PAA as under LEOBR, participating agencies and law enforcement leaders consistently reported to PERF that trial board backlogs are largely driven by an increase in requests for hearings under the PAA.

12. PERF, *Measuring the Impact* (see note 2).

Technology Costs

The only technology costs the agency incurred that were directly attributable to compliance with the PAA were annual user license fees totaling around $3,400 for the IAPro® system and the BlueTeams® add-on.[13] These programs support the standardization, tracking, and oversight of documentation and investigations related to use of force incidents, pursuits, and complaints of misconduct. These tools were among the most commonly reported technology-related expenses across agencies participating in this assessment.

Other Costs

While some agencies experienced major process and policy changes to meet the PAA's requirements, this agency's operations largely remained unchanged. As a result, costs for internal legal counsel to advise on police misconduct matters stayed consistent across both periods, averaging approximately $1,600.

The agency already had police assistants who served as victim advocates; however, to comply with PAA requirements, the Internal Affairs Division hired an additional assistant dedicated exclusively to supporting misconduct complaints. In 2025, the portion of this advocate's time devoted to misconduct matters corresponded to a cost estimated at $32,300.

Summary—Large Agency Misconduct Adjudication Process Cost Inventory

Table 2 on page 28 shows this large agency's total estimated costs under the LEOBR vs. the PAA.

13. "Versaterm IAPro" and "Versaterm BlueTeam" (see note 7).

Table 2. Estimated total costs under LEOBR vs. PAA

Description	Total estimated costs *(rounded)*	Total estimated costs *(rounded)*
	LEOBR	PAA
Number of cases	**209**	**358**
Total costs	**$2.0M**	**$3.3M**
Total investigation costs • Investigator time on police misconduct cases (*excluding departmental vehicle accident misconduct cases*) • Investigator time on departmental vehicle accident misconduct cases • Support personnel time on departmental vehicle accident misconduct cases (*including submitting to & responding to ACC requests*)	**$1.9M**	**$3.1M**
Total PAB costs • Staff time preparing for and attending PAB meetings • PAB member stipends	**N/A**	**$37.5K**
Total ACC costs • Preparing cases for ACC hearings & responding to requests for information (*excluding departmental vehicle accident misconduct cases*) • ACC member stipends	**N/A**	**$38.4K**
Total trial board costs • Investigator/IAD personnel & internal legal counsel time spent preparing for trial boards (witness subpoenas, coordinating w/ the officer subject to the complaint, etc.) • Time for officers serving as trial board members • Investigator/IAD personnel & internal legal counsel time spent appearing/presenting at trial board • Administrative Law Judge fees	**$12.7K**	**$46.3K**
Total technology costs • IAPro program & BlueTeams add-on	**N/A**	**$3.4K**
Total other costs • Internal legal counsel to advise on police misconduct matters • Victims' rights advocate	**$1.6K**	**$33.9K**

CASE STUDY 2. MEDIUM AGENCY

Law Enforcement Agency Costs

This medium law enforcement agency (defined as having 101–999 sworn officers) spent an estimated $279,100 adjudicating police misconduct cases during the LEOBR data period (June 31, 2021–June 31, 2022), compared to an estimated $656,200 during the PAA data period (January 1, 2025–January 1, 2026).

Although the agency's overall budget increased between the LEOBR and PAA periods, the total costs associated with adjudicating misconduct cases grew at a steeper rate. Consequently, these costs represented a larger share of the agency's overall budget in the PAA period—specifically, **3.58 times the proportion observed during the LEOBR period.**

Local Government Costs

PERF reviewed publicly available Fiscal Year 2022–2025 budgets for the local government under which the law enforcement agency operates. Starting in FY 2023, the PAB was budgeted in the "General Fund" under "Other Criminal Justice" at $18,900. In FY 2024, stipends were added for ACC members. The municipality allocated $83,900 in FY 2025 to cover both the PAB and the ACC.

Investigation Costs

Total investigation costs were approximately $282,600 during the PAA data period, compared with approximately $195,500 during the LEOBR period. The agency representative noted that there were significant salary increases between these two periods; these increases accounted for 63.54 percent of the cost difference.

A two-case increase in total cases—from 115 during the LEOBR period to 117 in the PAA period—accounted for 34.74 percent of the higher overall cost. During the LEOBR period, cases included 77 departmental vehicle cases and 38 non-vehicle cases. In comparison, the PAA period consisted of 73 departmental vehicle cases and 44 non-vehicle cases, as shown in figures 9 and 10 on page 30.

Figure 9. Medium agency LEOBR vs. PAA total cases

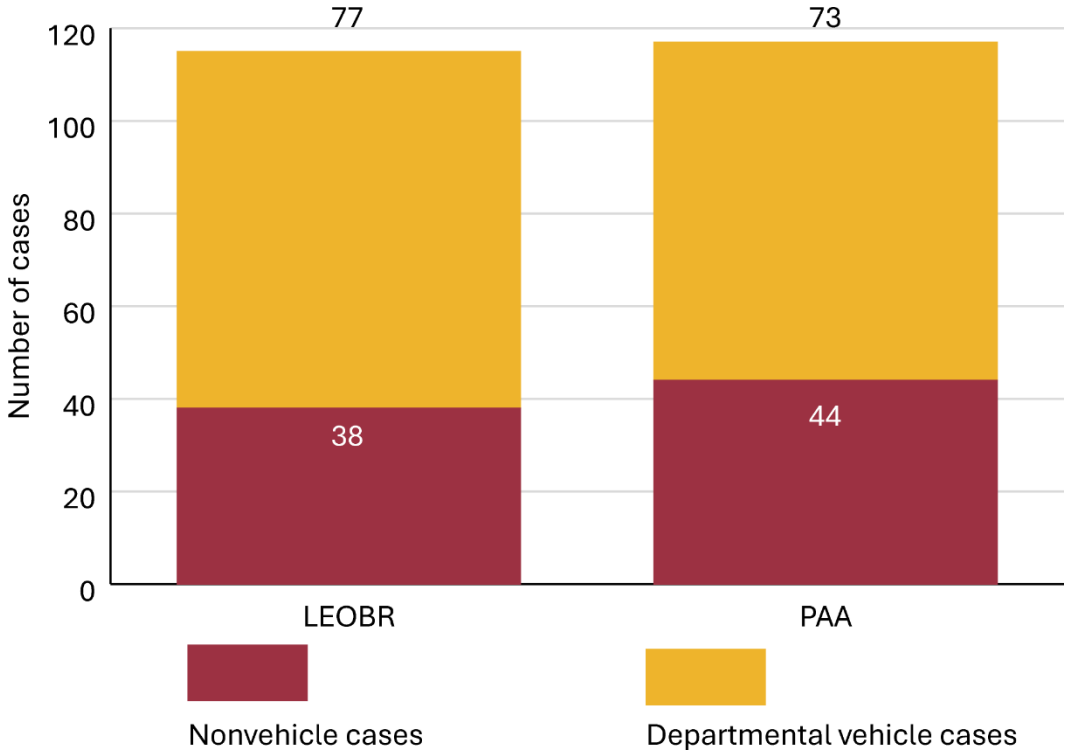
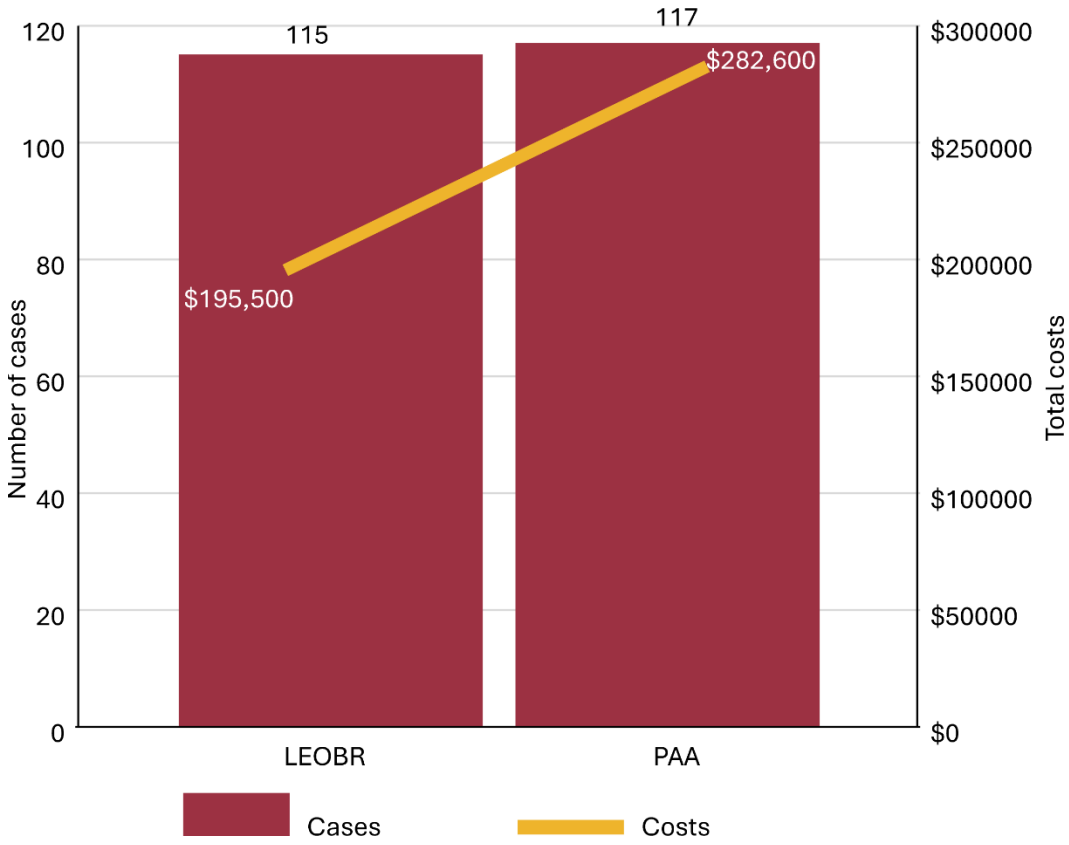


Figure 10. Medium agency LEOBR vs. PAA estimated total costs relative to case numbers



The remaining 1.72 percent of the cost increase was attributable to additional time spent on minor departmental vehicle cases. Support personnel time was added for submitting these cases to the ACC and responding to follow-up inquiries. For each case, the added cost was nominal, collectively adding about $1,500 across cases.

Police Accountability Board Costs

The PAB, not present under the LEOBR, entailed minor associated costs. The law enforcement agency incurred minimal personnel costs for staff time spent on PAB tasks, totaling $925 in 2025. These tasks included submitting quarterly administrative reports to the PAB and preparing for and attending quarterly PAB meetings, with corresponding staff time costs of $168 and $756, respectively.

Administrative Charging Committee Costs

The ACC represents an additional component of the police misconduct oversight process under the PAA and entails associated costs. The agency reported limited personnel costs associated with the ACC, consisting of investigators' and support personnel's time spent preparing misconduct cases (excluding departmental vehicle accident cases) for hearings and responding to follow-up inquiries. These costs totaled nearly $2,900 across cases in 2025.

Trial Board Costs

For this agency's case study, PERF did not compare the costs of trial boards under the LEOBR vs. the PAA; it only calculated the cost of trial boards for the agency under the PAA. The local government under which the agency operates covers most expenses associated with trial board hearings, including costs for legal counsel, an administrative law judge, and a civilian trial board member. The agency only pays support personnel for time spent preparing for trial boards (witness subpoenas, coordinating with the officer subject to the complaint, etc.) and investigators for time spent appearing at trial boards, costing almost $2,300 in 2025.

Technology Costs

The Attorney's Office covered costs for technology required for PAA activities and compliance.

Other Costs

The primary driver of the agency's overall cost increase between the LEOBR and the PAA periods was the cost of paying officers who were subject to complaints and suspended while awaiting final case outcomes. During the LEOBR period, only one member was suspended. During the PAA period, three members across different ranks were suspended, resulting in nearly $365,700 in costs—an increase of more than fourfold compared to the prior period.

The agency representative provided important context regarding how the financial impacts of paid officer suspensions differ under the PAA compared to the LEOBR:

> "Under the LEOBR and the PAA, officers can be suspended with pay pending the outcome of a trial board, and under both, officers can appeal the decision to the circuit court. However, how appeals are handled under the PAA has resulted in a financial burden for agencies. Under the LEOBR, if they won the appeal, they would receive back pay. Under the PAA, an agency is prohibited from implementing the trial board's decision if an officer files an appeal within 30 days and must wait to implement discipline until the circuit court's ruling. In several of our cases, officers appealed their terminations and, therefore, received their full salaries until the cases were heard nearly a year later in circuit court."

While not mentioned by the agency representative, this financial impact may be further exacerbated in agencies experiencing trial board backlogs— an issue discussed on page 16 of the main report.

A minimal other cost was a victim rights advocate's time spent on non–vehicle misconduct cases, totaling around $1,900.

Summary—Medium Agency Misconduct Adjudication Process Cost Inventory

Table 3 on page 33 shows this medium agency's total estimated costs under the LEOBR vs. the PAA.

Table 3. Estimated total costs under LEOBR vs. PAA

Description	Total estimated costs *(rounded)*	Total estimated costs *(rounded)*
	LEOBR	PAA
Number of cases	**115**	**117**
Total costs	**$279.1K**	**$656.2K**
Total investigation costs • Investigator time on police misconduct cases (*excluding departmental vehicle accident misconduct cases*) • Investigator time on departmental vehicle accident misconduct cases • Support personnel time on departmental vehicle accident misconduct cases (*including ACC submissions & requests*)	**$195.5K**	**$282.6K**
Total PAB costs • Staff time submitting administrative reports to PAB • Staff time preparing for and attending PAB meetings	**N/A**	**$925**
Total ACC costs • Preparing cases for ACC hearings & responding to requests for information (*excluding departmental vehicle accident misconduct cases*) • ACC member stipends	**N/A**	**$2.9K**
Total trial board costs • Investigator/IAD personnel time spent preparing for trial boards (*witness subpoenas, coordinating w/ the officer subject to the complaint, etc.*) • Investigator/IAD personnel time spent appearing/presenting at trial board	**Unknown**	**$2.3K**
Total technology costs	**N/A**	**N/A**
Total other costs • Paying officers subject to complaints (*while suspended*)		**$367.5K (nearly 4x increase)**

CASE STUDY 3. SMALL AGENCY

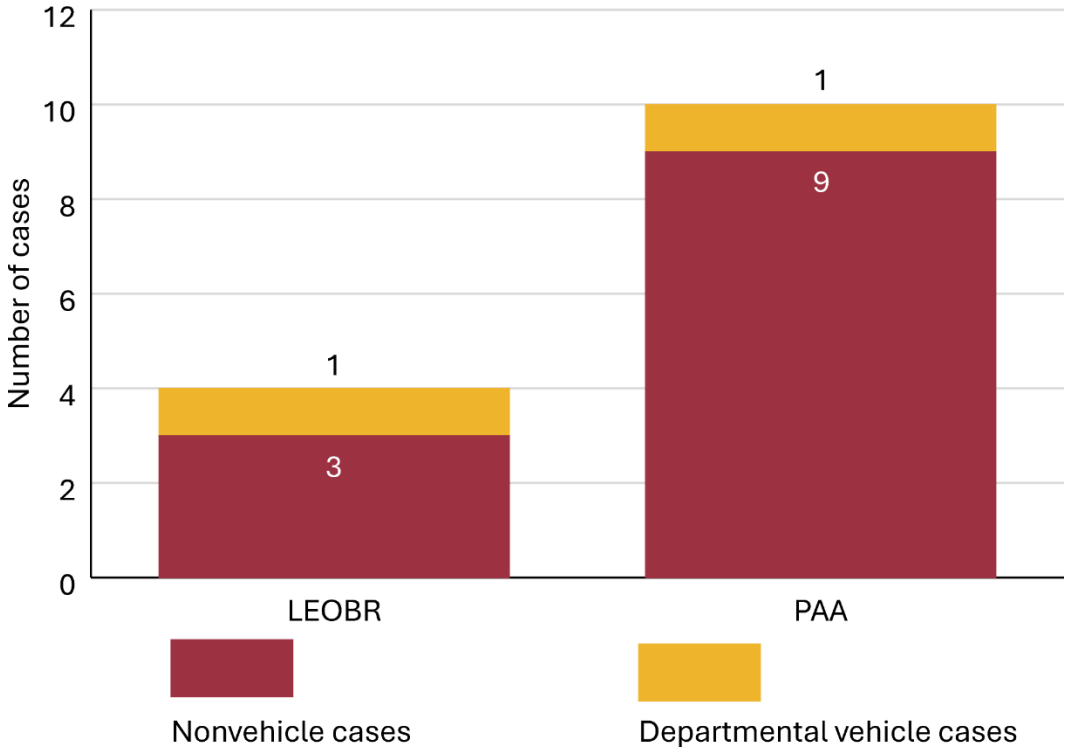
Law Enforcement Agency Costs

This small law enforcement agency (defined as having 100 or fewer sworn officers) spent an estimated $4,400 adjudicating police misconduct cases during the LEOBR data period (June 31, 2021–June 31, 2022), compared to an estimated $92,100 during the PAA data period (January 1, 2025–January 1, 2026).

Although the agency's overall budget increased between the LEOBR and PAA periods, the total costs associated with adjudicating cases grew at a much steeper rate. Consequently, these costs represented a far larger share of the agency's overall budget in the PAA period—specifically **15.32 times the proportion observed during the LEOBR period**.

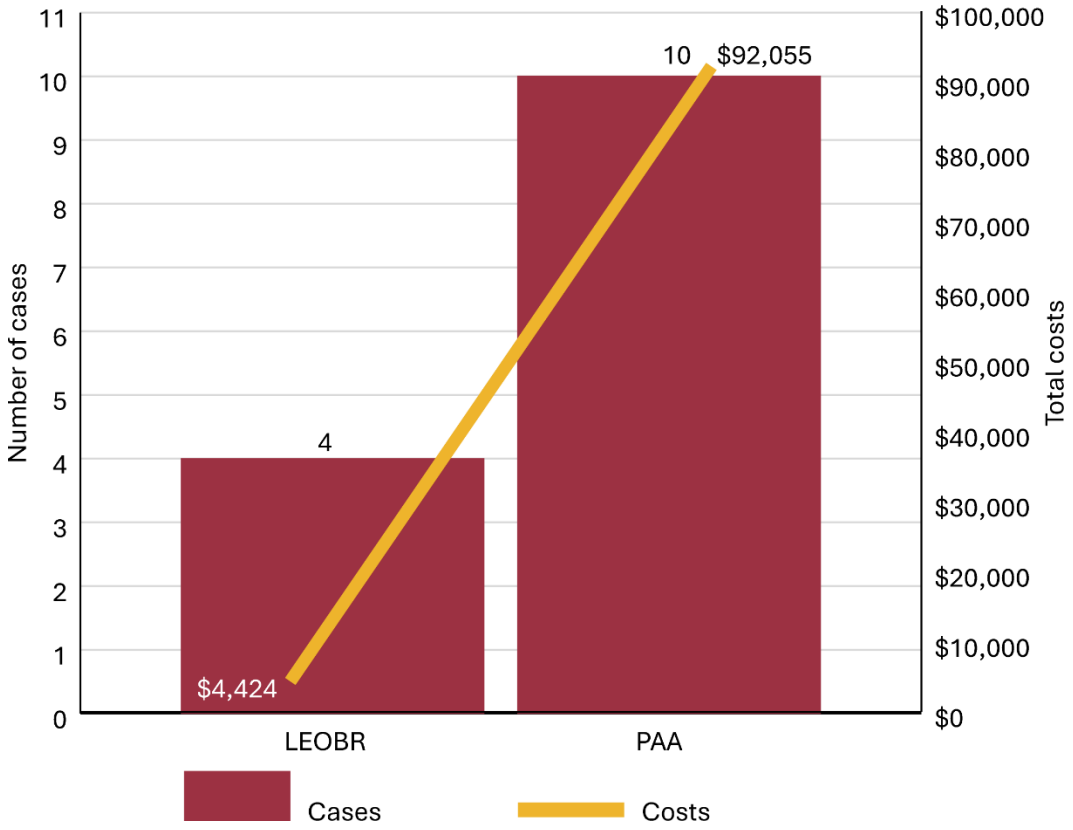
There were 2.5 times as many total misconduct cases during the PAA period (n=10) as there were during the LEOBR period (n=4), as shown in figure 11. The number of police misconduct cases (excluding departmental vehicle accident cases) tripled under the PAA (n=9) compared to what they had been under the LEOBR (n=3). The number of departmental vehicle accident misconduct cases remained the same in each period (n=1).

Figure 11. Small agency LEOBR vs. PAA total cases



While the total number of misconduct cases more than doubled, this increase is insufficient to explain why costs, **as a percentage of the overall budget,** were more than 15 times higher during the PAA period than the LEOBR period. Figure 12 on page 35 illustrates the disproportionate increase in costs relative to the increase in the number of cases. As detailed in the following sections, major contributors to this rise in costs included the extensive time required to manage each case—from investigation through trial board—as well as other associated expenses.

Figure 12. Small agency LEOBR vs. PAA estimated total costs relative to case numbers



Local Government Costs

PERF reviewed publicly available Fiscal Year 2022–2025 budgets for the local government under which the law enforcement agency operates. Funding was not identifiably allocated to costs associated with PAA activities, such as operating a PAB or an ACC.

Investigation Costs

Total investigation costs were approximately $42,500 during the PAA data period, compared with approximately $4,400 during the LEOBR period. Although the number of cases more than doubled between these periods, this increase alone does not account for the estimated 861 percent rise in investigation costs.

The increase in investigation costs appears to be driven primarily by investigators spending considerably more time per case during the PAA period than they did during the LEOBR period. According to an agency representative, investigators also assume the role of victim advocates because of their familiarity with the cases; however, the representative described this additional responsibility as a manageable time commitment.

During the PAA period, investigators spent about 3.2 times as many hours per non–departmental vehicle misconduct case, incurring an estimated cost of $4,600 per case, as they did during the LEOBR period, when they incurred approximately $1.4 thousand per case. Because of the expanded classification of departmental vehicle incidents involving a member of the public as misconduct, investigators spent around 10 times as many hours per case during the PAA period as during the LEOBR period. This increase resulted in an estimated cost of $1,200 per case during the PAA period, compared to $115 per case during the LEOBR period—a tenfold increase.

The agency representative said the increased number of hours required to complete investigations during the PAA necessitated staff restructuring. Whereas the Criminal Investigations Division previously managed the internal investigations caseload, the agency now assigns a sergeant full-time to these cases, including those that do not involve members of the public.

Police Accountability Board Costs

The PAB represents an additional component of the police misconduct oversight process under the PAA and entails associated costs. The law enforcement agency incurred minimal personnel costs for staff time spent on PAB tasks, totaling $450 in 2025.

Staff submitted biannual administrative reports to the PAB and prepared for and attended PAB meetings quarterly, costing $150 and $300 in staff time, respectively.

Administrative Charging Committee Costs

The agency's expenses associated with the ACC also appear nominal, totaling approximately $700 in 2025. These costs reflect the time a commander and support personnel spend preparing misconduct cases (excluding departmental vehicle accident cases) for hearings and responding to follow-up inquiries.

However, the agency representative noted that, for an agency of its size, sending an average of eight cases per year to the PAB and ACC represents a significant time commitment and added cost. In several instances, the representative said this time and effort have seemed unnecessary, particularly when officers subject to complaints have already acknowledged misconduct and agreed to discipline; such cases must still proceed through the full process because the agency is no longer allowed to impose summary punishment. Ultimately, the disciplinary outcomes have been about the same as those the agency would have recommended but have come at far greater effort and cost.

The representative also described a case in which the agency had recommended discipline, but the ACC exonerated the officer. The same officer later appeared before a trial board for a separate incident, at which point discipline was imposed. The representative expressed the view that had discipline been applied in the initial case, the subsequent misconduct—and the associated costs of a second adjudication process—might have been avoided.

The representative also had concerns about negligent retention, despite the agency not being the final decision-maker. In addition to potentially eroding community trust, such liability could carry financial consequences, including lawsuits, legal fees, and settlement costs.

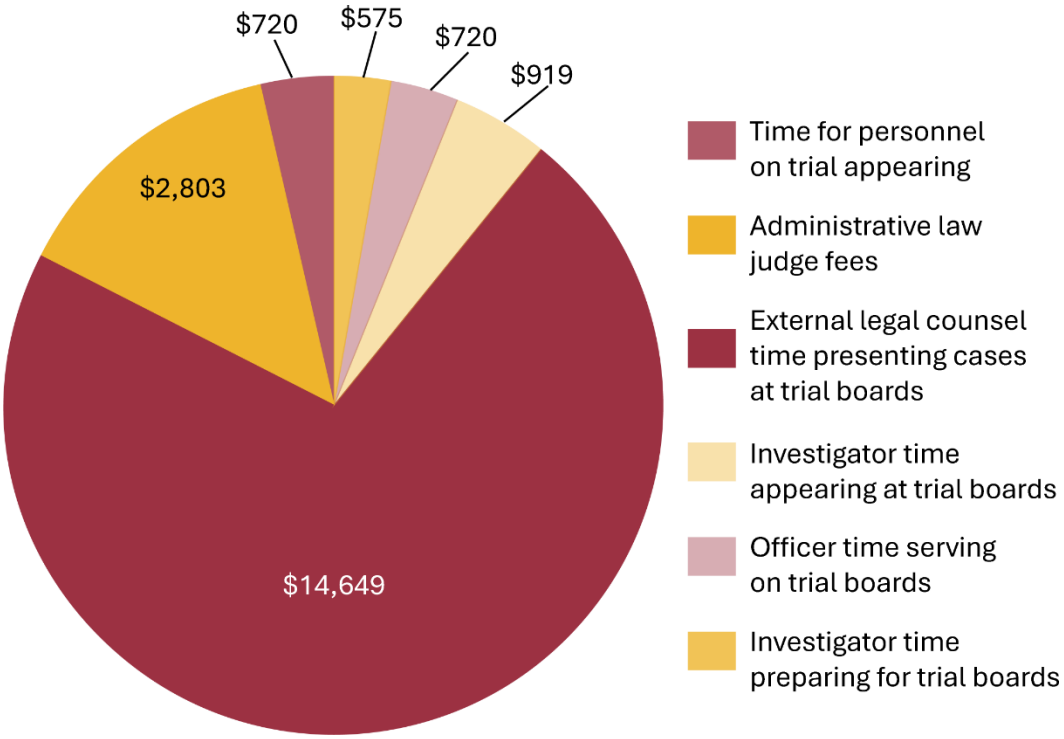
Trial Board Costs

The agency did not incur any trial board–related costs during the LEOBR period, but it incurred an estimated total $20,400 during the PAA period. On average, the agency now conducts two trial boards per year under the PAA, representing an increase from the LEOBR period, at an estimated $10,200 per trial board.

As mentioned on page 14, the quantitative data PERF collected is insufficient to conclude whether trial board numbers are higher under the PAA than the LEOBR. However, this agency and other participating agencies have consistently reported that requests for trial board hearings have increased; no agency representative has reported that their requests for hearings have decreased under the PAA.

Expenses for trial boards comprised investigator time preparing for the hearing (an estimated $575) and time for trial board attendance by the investigator ($919), an officer of equal rank serving as a board member ($720), and the officer subject to the complaint ($720). Administrative law judge fees totaled an estimated $2,800. In addition, the agency reported that it pays a private firm for trial board legal counsel and representation at an estimated cost of $14,700. The composition of expenses incurred for trial boards is shown in figure 13 on page 38.

Figure 13. Small agency PAA trial board costs (total estimated cost $20,385)



The agency representative said the use of a limited pool of legal staff across multiple agencies resulted in delays of more than a year to schedule one of its trial boards. According to the representative, this delay had serious financial implications, which are discussed in the Other Costs section of this case study on page 39. Many agency leaders participating in this assessment and PERF's second study also identified delays and backlogs in scheduling trial boards as a concern.[14]

Technology Costs

While many agencies participating in this assessment incur annual costs for public-facing misconduct complaint portals, the local government under which the agency operates covers those expenses.

The only technology costs directly attributable to compliance with the PAA were fees totaling approximately $11,000 for the IAPro® system and the BlueTeams® add-on, which the agency adopted to facilitate the sharing of internal affairs files.[15] Although the initial purchase was funded through a grant, securing and managing such grants also requires staff time and resources.

14. PERF, Measuring the Impact (see note 2).
15. "Versaterm IAPro" and "Versaterm BlueTeam" (see note 7).

Other Costs

During the PAA period, the agency placed one officer on desk duty while awaiting the outcome of the adjudication process, at an estimated cost of $ 17,000; no officers were placed on desk duty during the LEOBR period. Although the agency would ordinarily continue to pay officers' salaries during desk duty assignments, the financial impact is influenced by the length of the adjudication process, during which officers are unable to perform their regular duties.

The agency representative also identified major financial consequences associated with delays in scheduling trial boards. In one case, the agency determined that termination of the officer subject to complaint was warranted; however, legal counsel advised waiting until the trial board reached a decision before proceeding. As a result, the agency continued to pay the officer's salary while the officer was on desk duty until the verdict was issued. This delay increased costs and, according to the agency representative, prolonged the period of stress and uncertainty the officer experienced.

Participants in PERF's second study echoed concerns about delayed and backlogged trial boards. Beyond fiscal impacts, they described these delays as undermining the effectiveness and legitimacy of the disciplinary process, negatively affecting employee morale as officers await outcomes, and limiting police chiefs' ability to administer timely discipline.[16]

16. PERF, *Measuring the Impact* (see note 2).

Summary—Small Agency Misconduct Adjudication Process Cost Inventory

Table 4 shows this small agency's total estimated costs under the LEOBR vs. the PAA.

Table 4. Estimated total costs under LEOBR vs. PAA

Description	Total estimated costs (rounded)	Total estimated costs (rounded)
	LEOBR	PAA
Number of cases	**4**	**10**
Total costs	**$4.4K**	**$92.1K**
Total investigation costs • Investigator time on police misconduct cases (*excluding departmental vehicle accident misconduct cases*) • Investigator time on departmental vehicle accident misconduct cases	**$4.4K**	**$42.5K**
Total PAB costs • Staff time for submitting administrative reports to PAB • Staff time preparing for and attending PAB meetings	**N/A**	**$450**

Total AAC costs
• Preparing cases for ACC hearings & responding to requests for information (*excluding departmental vehicle accident misconduct cases*)
  ▪ Commander
  ▪ Support personnel
	N/A	**$700**

Total trial board costs • Investigator time spent preparing for trial boards (*witness subpoenas, coordinating w/ the officer subject to the complaint, etc.*) • Time for officers serving as trial board members • Investigator time spent appearing/presenting at trial board • External counsel preparing for and presenting case at trial board • Administrative law judge fees	**$0**	**$20.4K**
Total technology costs • IAPro system & BlueTeams add-on	**N/A**	**$11K**
Total other costs • Paying officer subject to complaint (*while on desk duty*)	**N/A**	**$17K**

COST INVENTORY AND BUDGET TOOL

We recommend that law enforcement agencies use this tool as a cost inventory to assess (as accurately as possible) the costs they incur each year. It can also be used to record and track cost data over time.

These cost data can then be used to proactively budget for future costs that the agency may incur for PAA-related activities and compliance. This information will enable the law enforcement agency and the local government under which it operates to budget for these expenses accordingly.

Not all expenses will be applicable for all agencies. Some expenses depend on the locality's implementation of the PAA and budgetary decisions of local governing bodies, such as PAB and ACC member stipends and many trial board costs.

For each line item, enter the total cost, total hours, and hourly salary rate where applicable. Category totals reflect the sum of all line items in that section. The **Agency notes** column allows agencies to provide additional details about the budgeted item.

Cost Inventory and Budget Tool				
Description of cost	**PAA total cost**	**PAA total hours**	**Hourly salary rate**	**Agency notes**
Investigation Costs	$			The cumulative personnel costs associated with investigating complaints against officers, including investigator and support personnel time.
Investigator time on police misconduct cases (excluding departmental vehicle accident cases). *Add lines for additional officer time as needed.*	$			
Investigator <u>overtime</u> on police misconduct cases (excluding departmental vehicle accident cases).	$			
Support personnel time on police misconduct cases *(excluding departmental vehicle accident cases).*	$			

Cost Inventory and Budget Tool				
Description of cost	**PAA total cost**	**PAA total hours**	**Hourly salary rate**	**Agency notes**
Investigation Costs *(continued)*				
Investigator overtime on department vehicle accident cases (involving a member of the public).	$			
Support personnel time on departmental vehicle accident cases (involving a member of the public).	$			
New staff to meet PAA caseload.	$			
Add more lines as needed, e.g. time for additional personnel.	$			
Police Accountability Board costs	$			The cumulative staff time costs associated with fulfilling reporting obligations to and engaging with the PAB, including administrative submissions, meeting preparation, and attendance.
Personnel time submitting administrative reports to the PAB	$			
Personnel time preparing for and attending PAB meetings	$			
PAB member stipends	$	N/A	N/A	May be paid by local governing body.
Add more lines as needed.				
Administrative Charging Committee costs	$			The cumulative costs associated with preparing and submitting ACC-related documents and responding to ACC requests for information, including time for investigators and support personnel.

Cost Inventory and Budget Tool				
Description of cost	**PAA total cost**	**PAA total hours**	**Hourly salary rate**	**Agency notes**
Staff time preparing cases for ACC hearings & responding to requests for information (excluding departmental vehicle accident misconduct cases)	$			
Staff time preparing cases for ACC hearings & responding to requests for information on departmental vehicle accidents	$			
ACC member stipends	$	N/A	N/A	May be paid by local governing body.
Add more lines as needed.				
Trial Board costs	$			The cumulative costs associated with the formal disciplinary hearing process, including preparation and presentation time for internal staff, legal counsel, and any other external or administrative costs.
Investigator/IAD personnel time spent preparing for trial boards *(witness subpoenas, coordinating administrative law judge, etc.)*	$			
Internal legal counsel time spent preparing for trial boards *(witness subpoenas, coordinating with the officer subject to the complaint, etc.)*				
Time for officers' service as trial board members	$			

Cost Inventory and Budget Tool				
Description of cost	**PAA total cost**	**PAA total hours**	**Hourly salary rate**	**Agency notes**
Investigator/IAD personnel time spent appearing/presenting at trial board	$			
Internal legal counsel time spent appearing/presenting at trial board				
External legal counsel time (county attorney, conflict attorney, private counsel, etc.)	$			
Administrative law judge fees	$			
Add more lines as needed.				
Technology costs	$			The cumulative costs of software systems and licenses required to meet PAA compliance.
IAPro software	$	N/A	N/A	Fixed cost; hours not applicable
BlueTeams, or other RMS system add-on	$	N/A	N/A	Fixed cost; hours not applicable
Public portal or database	$	N/A	N/A	Fixed cost; hours not applicable
EIPro (Early Identification software)	$	N/A	N/A	Fixed cost; hours not applicable
Simplified Data subscription	$	N/A	N/A	Fixed cost; hours not applicable
Security software or licenses	$	N/A	N/A	Fixed cost; hours not applicable
Transcription services	$			
Add more lines as needed.				
Other costs	$			The cumulative costs that do not fall within the above categories but are associated with PAA compliance, including legal counsel, officer pay during suspension or desk duty, and victim rights advocate services.

Cost Inventory and Budget Tool				
Description of cost	**PAA total cost**	**PAA total hours**	**Hourly salary rate**	**Agency notes**
Internal legal counsel to advise on police misconduct matters	$			
External legal counsel to advise on police misconduct matters				
Victim rights advocate	$			
Pay for officers subject to a complaint while suspended or on desk duty	$			
Add more lines as needed.				

APPENDIX A. INTERVIEW PROTOCOL

This protocol includes the initial questions asked during interviews of law enforcement agency representatives to identify costs relevant to PAA compliance for inclusion in the structured data collection tool and better understand the financial impact of the PAA. Follow-up questions varied depending on representatives' answers and the specific costs incurred by their agencies.

INVESTIGATIONS

- How have investigations related to the PAA affected your agency's expenses?
  - I have more specific questions below to help us dive deeper.
- We have heard from many agencies that the PAA definitions of reportable misconduct and requirement for investigations to be completed within 1 yr & 1 day have increased caseloads significantly.
- Have costs in investigator time/overtime increased due to time spent on tasks and investigations for Administrative Charging Committees and/or trial boards?
  - If so, by approximately how much?
- Did your agency already have a victims' rights advocate?
  - If yes, did costs increase due to PAA?
  - If no, what were the associated costs for assigning or hiring one?
- Did your agency already have a public contact on police misconduct matters?
  - If so, did costs increase (due to increased reports, time to notify complainants at every stage, time to write case summaries for complainants)?
  - Or are complaints submitted through a portal?
- Does your agency pay the officer subject to the complaint while they are suspended?

POLICE ACCOUNTABILITY BOARD

- How many reports, on average, are you submitting to the PAB annually?
- What are the approximate costs associated with the time taken for submitting a report to the PAB?
- Does your agency conduct training – formal or informal – for PAB members?
  - Are there costs associated?
    - time or consultant fees for developing a training curriculum?
    - time spent having them do tours or go on ride-alongs?

Administrative Charging Committee

- How many cases, on average, are going to the ACC annually?
- What are the average costs associated with the time spent for the officer subject to the complaint and other agency representatives appearing at the ACC?
- How much time, aka how much does it cost approximately, to write a discipline recommendation for the ACC?
  - How about for imposing penalties or recommending penalties greater than or equal to ACC penalty?

Trial Board

- We've heard that this is where many of the PAA compliance costs are for law enforcement agencies.
- How many cases on average are going to a trial board annually?
  - What percentage of the reported cases is this?
- How many hours, on average, does one of your officers serve on each trial board?
- What are the costs in time/salary & travel for the trial board member to attend the mandatory training?
- Does your agency have an individual trial board process?
  - If yes, were there costs in employee or consultant time to establish this?
- Per trial board, what are the approximate costs in employee time/salary for presenting cases?
- Are there costs for additional legal counsel hired by the PD to advise on PAA matters?
- What does it cost to pay an Administrative Law Judge for a trial board?

PAA Compliance Costs Overall

- Given what we talked about already, what does the total cost of PAA compliance look like for your agency?
  - Any technology costs?
- What additional costs of PAA compliance might be incurred by other city departments outside the PD?

APPENDIX B. DATA COLLECTION TOOL

SPREADSHEET INSTRUCTIONS

Measuring the Impact of the Maryland Police Accountability Act (PAA)—PAA compliance cost assessment

Background

Over the past two years, the Police Executive Research Forum (PERF) has collaborated with the Maryland Governor's Office of Crime Prevention and Policy (MD GOCPP) and Maryland's law enforcement agencies to study and document the impact of the Police Accountability Act of 2021 (PAA). Our previous findings are available in the following reports: Implementation of the Maryland Police Accountability Act of 2021 (June 2024) and Measuring the Impact of the Maryland Police Accountability Act (July 2025).[17]

With continued funding from GOCPP, PERF has launched a third phase of this initiative, which will focus on two key objectives identified in the previous phases:

1. Develop recommended statewide common language and data standards.
2. Study the financial impact of PAA implementation on Maryland law enforcement agencies and communities.

Spreadsheet Purpose

We appreciate your participation in this initiative, which will help PERF carry out the second objective. The purpose of the attached spreadsheet is to collect cost data related to PAA compliance to assess individual and overall costs incurred by Maryland law enforcement agencies. This will also provide information that will be used to analyze the financial impact of implementing the PAA compared with the Law Enforcement Officer Bill of Rights (LEOBR).

Relevant Data Periods

For this initiative, PERF is asking for two years of data on the costs of handling police misconduct cases. This will allow for comparison of costs under the PAA versus LEOBR.

LEOBR

For LEOBR costs, provide data for the one-year period prior to the PAA's effective start date (7/1/22), i.e., **June 30, 2021 – June 30, 2022** (6/30/21 – 6/30/22).

17. PERF, *Implementation* (see note 1); PERF, *Measuring the Impact* (see note 2).

PAA

For PAA costs, provide data for the most recent one-year period under the PAA, i.e., **January 1, 2025 – January 1, 2026** (1/1/25 – 1/1/26).

Instructions

If you have any questions regarding this project or completing the spreadsheet, contact Zoe Mack, PERF Research Associate, at zmack@policeforum.org or (202) 454-8314.

Overall

The closer you can get to providing actual costs, the more accurately we can determine the overall financial impact of PAA implementation. Please do not report the same cost in multiple sections of the form; for example, if time spent drafting findings recommendations is reported under Administrative Charging Committee Costs, do not also include that cost under Investigation Costs.

For your convenience, the total costs for each line item and category will auto-calculate based on the numbers you've entered.

If you need additional lines to account for more staff or items purchased, simply copy and paste the "add more lines as needed" row to have these totals auto-calculate. For each line added, write in column A the position or item related to the cost.

Investigation Costs

In this section, you are asked to fill in the numbers for time spent on investigations under the LEOBR and the PAA. This information will allow us to analyze any cost differences between the LEOBR and PAA processes.

You will first be asked to enter the investigator time spent investigating police misconduct cases, *excluding* departmental vehicle accidents, under each framework. Next, you will be asked to provide the time spent on *departmental vehicle accident* cases, including time spent on Administrative Charging Committee tasks. This will allow us to quantify any additional financial impact resulting from the PAA requirements for handling these incidents.

Use the hourly manning rates for investigator and support personnel positions. Please add more lines to include any other staff positions that contributed time to each investigation type. This ensures a more accurate assessment of personnel costs.

Police Accountability Board Costs

This section covers time spent on Police Accountability Board (PAB) related tasks by law enforcement agency employees. Tasks may include submitting administrative reports to PAB; attending PAB meetings; developing and preparing presentations for PAB meetings; compiling and providing summary statistical data; and coordinating with PAB members or support staff regarding the receipt of complaints made directly to PAB.

Administrative Charging Committee Costs

This section covers all time spent on Administrative Charging Committee (ACC) tasks by investigators and other employees (add lines as needed). Preparation includes tasks like submitting case reports and writing discipline recommendations. Responding to requests includes tasks such as providing additional investigative information, appearing before the committee, and implementing the ACC discipline recommendations.

Trial Board Costs

This section covers all time spent preparing for and holding a Trial Board, including subpoenaing witnesses, coordinating with the officer subject to the complaint, scheduling hearings, preparing arguments for the hearing, attending the hearing, and paying the Administrative Law Judge presiding.

Because the officer serving on the Trial Board must be of the same rank as the officer subject to the complaint, please add lines for every rank that served on a Trial Board within the relevant time period. Use the hourly manning rate for these positions.

Technology Costs

In this section, include only technology or software purchases and subscriptions that were made for PAA compliance. Do not include costs or recurring expenses that were initiated under LEOBR processes (e.g., if case management system software was purchased and implemented prior to the PAA effective date, do not report that cost here even if the system is still in use.

Technology costs may include software or licensing for case management, complaint intake (e.g., an online portal), complainant case update notifications, system updates, and security software. Hardware such as laptops or external drives may be included if the purchase is directly related to PAA compliance. For example, if a new laptop is needed because PAA compliance requires creating a new staff position. Do not include hardware purchases that are regularly scheduled replacements of pre-existing equipment (e.g., a detective's laptop that is scheduled to be replaced every 5 years).

The specific technology or software should be described in column A (e.g., "laptop for newly created police assistant position" or "annual subscription fee for new software used to intake complaints, manage and document cases, and provide case updates to complainants).

Other Costs

In this section, line items under PAA "legal counsel to advise on police misconduct cases" do not include their time spent on trial boards. Under the PAA, time spent includes advising on how the legislation affects reporting types of complaints and developing the department's PAA policies.

Add additional lines as needed to include any additional costs not otherwise captured in the sections above.

DATA COLLECTION SPREADSHEET

The following pages show the data collection spreadsheet.

Cost Inventory: PAA Compliance Associated Costs					
The purpose of this spreadsheet is to inventory and total the individual and overall costs associated with complying with the PAA, compared to the LEOBR. For your convenience, the total costs for each line item and category will be calculated automatically based on the amounts you enter. **For LEOBR costs, provide data for the one-year period prior to the PAA effective start date (7/1/22), i.e. June 30, 2021 – June 30, 2022 (6/30/21 – 6/30/22).** **For PAA costs, provide data for the most recent one-year period under the PAA, i.e. January 1, 2025 – January 1, 2026 (1/1/25 – 1/1/26).**					
Agency Name					
Number of Sworn Officers					
Overall Department Budget					
Your Name					
Phone Number					
Email					
Investigation Costs					
				*Please do not fill out this column. Numbers will auto-generate based on the previous responses.	
	Hourly rate	**Hours per case**	**Number of cases**	**Total**	
LEOBR:	x	x	x	x	
Investigator time on cases **(*excluding vehicle accidents*)**				$ -	
Investigator time on **departmental vehicle accidents**				$ -	
Add more lines as needed (ex. support personnel)				$ -	
PAA:	x	x	x		
Investigator time on cases (*excluding vehicle accidents*)				$ -	
Investigator time on **departmental vehicle accidents** *(including submitting to & responding to ACC requests)*				$ -	
Support personnel time spent on **departmental vehicle accidents** (*including submitting to & responding to ACC requests*)				$ -	
Add more lines as needed				$ -	
				Total LEOBR Investigation Costs	**$ -**
				Total PAA Investigation Costs	**$ -**
Police Accountability Board Costs					
				*Please do not fill out this column. Numbers will auto-generate based on the previous responses.	
	Hourly rate	**Hours per report/ meeting**	**Number of reports/meetings**	**Total**	
Time costs for staff submitting administrative reports to **PAB**				$ -	
Staff time prepping for and attending PAB meetings				$ -	
				Total Admin Task Costs	**$ -**

Administrative Charging Committee Costs					
Time prepping for **ACC** and responding to requests for information (**excluding dept. vehicle accidents**; e.g., *submitting cases, recommendations, appearing if applicable*)				*Please do not fill out this column. Numbers will auto-generate based on the previous responses.	
	Hourly rate	**Hours per case**	**Number of cases (total number)**	**Total**	
Investigator				$ -	
Support Personnel				$ -	
Add more lines as needed				$ -	
				Total ACC Costs	**$ -**
Trial Board Costs					
				*Please do not fill out this column. Numbers will auto-generate based on the previous responses.	
Time prepping for Trial Board *(witness subpeonas, coordinating w/ officer subject to complaint, etc.)*	**Hourly rate**	**Hours per case**	**Number of cases (total number)**	**Total Costs**	
Investigator #1/IAD personnel *(if applicable)*				$ -	
Internal legal counsel *(if applicable)*				$ -	
Time for officers serving as **Trial Board members**				$ -	
Department employee time appearing/presenting at Trial Board					
Investigator #1/IAD personnel *(if applicable)*				$ -	
Internal legal counsel *(if applicable)*				$ -	
External counsel time presenting case at Trial Board (*if applicable; ex. County Attorney's Office, "Conflict Attorney" from Office of Law; private counsel)*				$ -	
Administrative Law Judge *(or retired judge)*				$ -	
				Total Trial Board Costs	**$ -**
Technology Costs					
(ex. IA Pro upgrades, complaint intake & complainant notification portal, security software or licenses, etc.)				*Please do not fill out this column. Numbers will auto-generate based on the previous responses.	
	Cost	**Quantity/time period**	**Total**		
Versaterm Blue Teams IA Pro			$ -		
Item (*write-in*)			$ -		
Item (*write-in*)			$ -		
				Total PAA Technology Costs	**$ -**

Other Costs					
				*Please do not fill out this column. Numbers will auto-generate based on the previous responses.	
Legal counsel to advise on police misconduct matters	**Hourly rate**	**Hours**	**Total**		
LEOBR:					
Internal legal counsel			$ -		
External legal counsel			$ -		
PAA:					
Internal legal counsel			$ -		
External legal counsel			$ -		
Paying officer subject to complaint *(while suspended or on desk duty)*	**Hourly rate**	**Hours**	**Number of cases (total number)**	**Total**	
LEOBR				$ -	
PAA				$ -	
Victim Rights Advocate (*if role not fulfilled by investigator)*	**Hourly rate**	**Hours per case**	**Number of cases**	**Total**	
LEOBR				$ -	
PAA				$ -	
Total Other costs not yet captured *(if any; fill in below)*	**Cost/Hourly rate**	**Quantity/hours**	**Total**		
Item/employee *(specify)*			$ -		
Item/employee *(specify)*			$ -		
Item/employee *(specify)*			$ -		
				Total LEOBR Other Costs	**$ -**
				Total PAA Other Costs	**$ -**
Total PAA Compliance Associated Costs					
				Total LEOBR Costs	**$ -**
				Total PAA Costs	**$ -**

APPENDIX C. SAMPLE COMPLETED SPREADSHEET

The following pages show a sample completed spreadsheet containing fictitious data.

Cost Inventory: PAA Compliance Associated Costs

The purpose of this spreadsheet is to inventory and total the individual and overall costs associated with complying with the PAA, compared to the LEOBR. For your convenience, the total costs for each line item and category will be calculated automatically based on the amounts you enter.

For LEOBR costs, provide data for the one-year period prior to the PAA effective start date (7/1/22), i.e. June 30, 2021 – June 30, 2022 (6/30/21 – 6/30/22).
For PAA costs, provide data for the most recent one-year period under the PAA, i.e. January 1, 2025 – January 1, 2026 (1/1/25 – 1/1/26).

Agency Name	
Number of Sworn Officers	
Overall Department Budget	
Your Name	
Phone Number	
Email	

Investigation Costs

	Hourly rate	Hours per case	Number of cases	*Please do not fill out this column. Numbers will auto-generate based on the previous responses. Total
LEOBR:	x	x	x	x
Investigator time on cases **(*excluding vehicle accidents*)**	$ 60.00	140	130	$ 1,092,000.00
Investigator time on **departmental vehicle accidents**	$ 60.00	5	4	$ 1,200.00
Add more lines as needed (ex. support personnel)				$ -
PAA:	x	x	x	
Investigator time on cases (*excluding vehicle accidents*)	$ 60.00	140	130	$ 1,092,000.00
Investigator time on **departmental vehicle accidents** *(including submitting to & responding to ACC requests)*	$ 60.00	5	15	$ 4,500.00
Support personnel time spent on **departmental vehicle accidents** (*including submitting to & responding to ACC requests*)	$ 21.00	5	15	$ 1,575.00
Add more lines as needed				$ -

Total LEOBR Investigation Costs	**$ 1,093,200.00**
Total PAA Investigation Costs	**$ 1,098,075.00**

Police Accountability Board Costs

	Hourly rate	Hours per report/ meeting	Number of reports/meetings	*Please do not fill out this column. Numbers will auto-generate based on the previous responses. Total
Time costs for staff submitting administrative reports to **PAB**	$ 60.00	2	12	$ 1,440.00
Staff time prepping for and attending PAB meetings	$ 60.00	1	12	$ 60.00

Total Admin Task Costs	**$ 1,500.00**

Sample Completed Data Collection Spreadsheet

Administrative Charging Committee Costs

Time prepping for **ACC** and responding to requests for information (**excluding dept. vehicle accidents**; e.g., *submitting cases, recommendations, appearing if applicable*)

*Please do not fill out this column. Numbers will auto-generate based on the previous responses.

	Hourly rate	Hours per case	Number of cases (total number)	Total
Investigator	$ 60.00	2	130	$ 15,600.00
Support Personnel	$ 60.00		130	$ -
Add more lines as needed				$ -

Total ACC Costs **$ 15,600.00**

Trial Board Costs

*Please do not fill out this column. Numbers will auto-generate based on the previous responses.

Time prepping for Trial Board *(witness subpeonas, coordinating w/ officer subject to complaint, etc.)*	Hourly rate	Hours per case	Number of cases (total number)	Total Costs
Investigator #1/IAD personnel *(if applicable)*	$ 60.00	40	25	$ 60,000.00
Internal legal counsel *(if applicable)*	$ 70.00	40	25	$ 70,000.00
Time for officers serving as **Trial Board members**	$ 60.00	12	25	$ 18,000.00
Department employee time appearing/presenting at Trial Board				
Investigator #1/IAD personnel *(if applicable)*	$ 60.00	8	25	$ 12,000.00
Internal legal counsel *(if applicable)*	$ 70.00	8	25	$ 14,000.00
External counsel time presenting case at Trial Board (*if applicable; ex. County Attorney's Office, "Conflict Attorney" from Office of Law; private counsel)*				$ -
Administrative Law Judge *(or retired judge)*	$ 250.00	16	25	$ 100,000.00

Total Trial Board Costs **$ 274,000.00**

Technology Costs

(ex. IA Pro upgrades, complaint intake & complainant notification portal, security software or licenses, etc.)

*Please do not fill out this column. Numbers will auto-generate based on the previous responses.

	Cost	Quantity/time period	Total
Versaterm Blue Teams IA Pro	$4,500	1	$ 4,500.00
Item (*write-in*)			$ -
Item (*write-in*)			$ -

Total PAA Technology Costs **$ 4,500.00**

Other Costs

*Please do not fill out this column. Numbers will auto-generate based on the previous responses.

Legal counsel to advise on police misconduct matters	**Hourly rate**	**Hours**	**Total**
LEOBR:			
Internal legal counsel	$ 70.00	200	$ 14,000.00
External legal counsel			$ -
PAA:			
Internal legal counsel	$ 70.00	416	$ 29,120.00
External legal counsel			$ -

Paying officer subject to complaint *(while suspended or on desk duty)*	**Hourly rate**	**Hours**	**Number of cases (total number)**	**Total**
LEOBR	$ 60.00	240	6	$ 86,400.00
PAA	$ 60.00	240	6	$ 86,400.00

Victim Rights Advocate (*if role not fulfilled by investigator)*	**Hourly rate**	**Hours per case**	**Number of cases**	**Total**
LEOBR				$ -
PAA				$ -

Total Other costs not yet captured ***(if any; fill in below)***	**Cost/Hourly rate**	**Quantity/hours**	**Total**
Item/employee *(specify)*			0
Item/employee *(specify)*			0
Item/employee *(specify)*			0

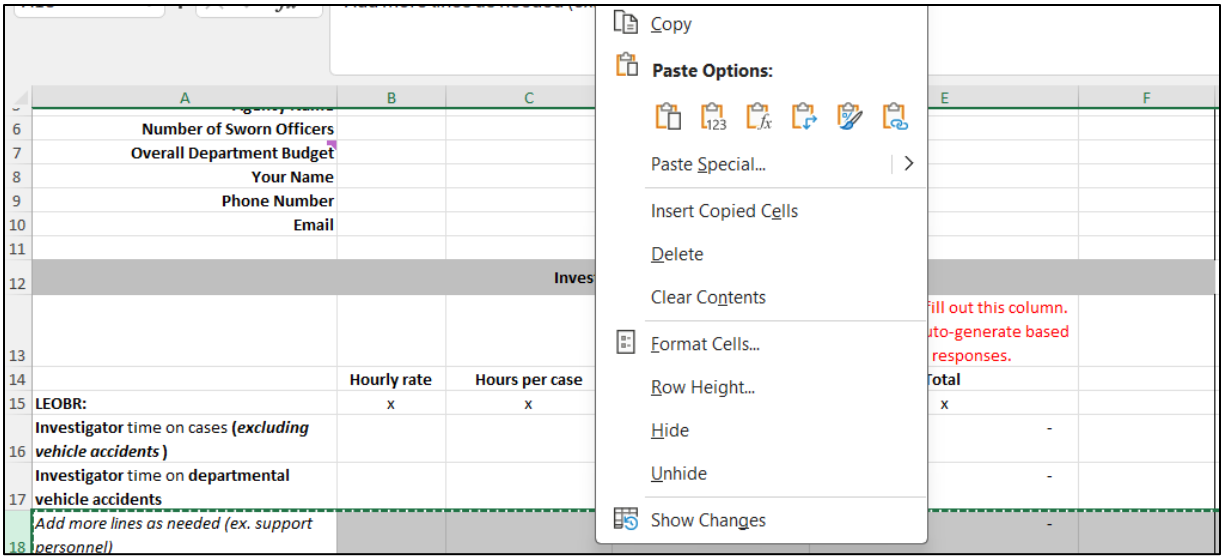
Total LEOBR Other Costs	**$ 100,400.00**
Total PAA Other Costs	**$ 115,520.00**

Total PAA Compliance Associated Costs

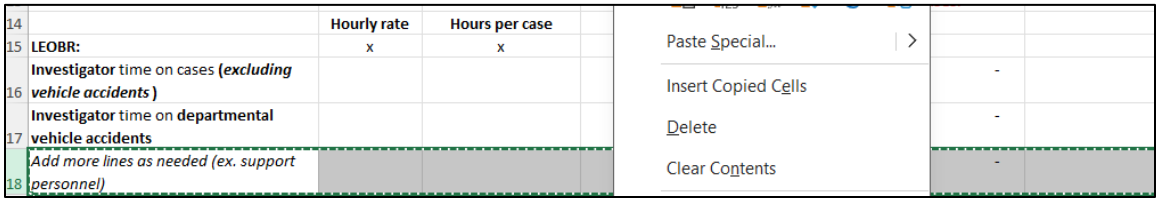
Total LEOBR Costs	**$ 1,193,600.00**
Total PAA Costs	**$ 1,509,195.00**

Instructions for adding lines:

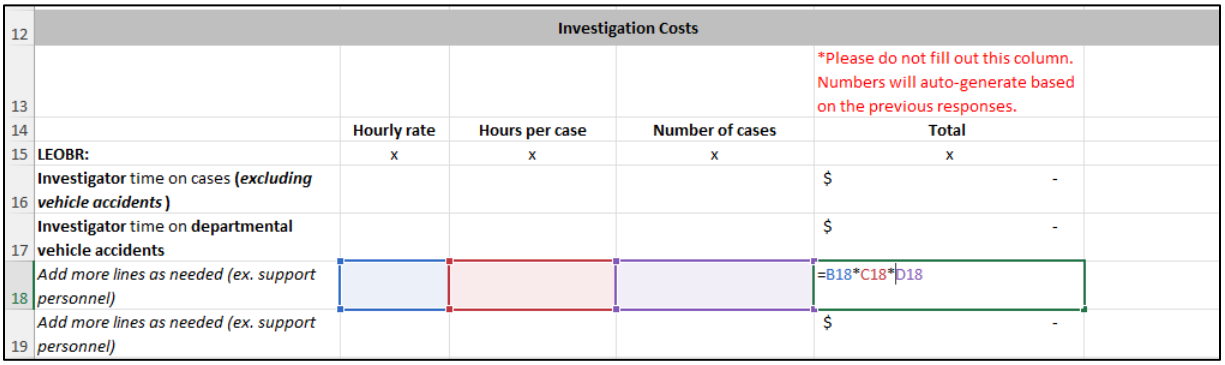
1) Right-click on the “add more lines as needed” row, and then click “copy” from the menu.



2) With the row still selected, right-click and then click “insert copied cells” from the menu.



3) This will insert a row above the selected row that also auto-calculates totals.



4) For each line added, write in column A the position or item related to the cost.


PERF
50 YEARS