



NATIONAL ASSOCIATION OF POLICE ORGANIZATIONS, INC.

Representing America's Finest

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EXECUTIVE OFFICERS October 15, 2026

MICHAEL McHALE

President

Florida Police Benevolent
Association

Ms. Tammie Gregg

Acting Director

Bureau of Justice Assistance

JOHN A. FLYNN

Vice President

United States Department of Justice

VIA EMAIL: PSOB.Legal.Counsel@usdoj.gov

Police Benevolent

Association of New York City

CRAIG LALLY

Recording Secretary

Los Angeles Police

Protective League

RE: October 13, 2026, OJP PSOB Listening Session – Written Comments

Dear Acting Director Gregg:

SCOTT HOVSEPIAN

Treasurer

Massachusetts Coalition
of Police

On behalf of the National Association of Police Organizations (NAPO), I submit these written comments following the October 13, 2026, listening session held by the Office of Justice Programs (OJP) on the current state of the Public Safety Officers' Benefits (PSOB) Program.

DARRELL KRIPLEAN

Sergeant-at-Arms

Phoenix Law Enforcement
Association

NAPO is a coalition of police unions and associations from across the United States that serves to advance the interests of America's law enforcement through legislative and legal advocacy, political action, and education. Founded in 1978, NAPO now represents more than 1,000 police units and associations and some 250,000 sworn law enforcement officers who share a common dedication to fair and effective crime control and law enforcement.

SCOTT LEETON

Executive Secretary

Combined Law Enforcement
Associations of Texas

NAPO appreciates your stated commitment to improving the claims experience, efficiency, and timeliness of determinations under the PSOB Program. Congress established the Program 50 years ago both to offer peace of mind to those pursuing careers in public safety and to affirm the value American society places on those who serve their communities in potentially dangerous circumstances. The Program's current performance, however, does little to assure officers that the federal government will fulfill its responsibility to care for them and their families.

MARK YOUNG

Vice President,

Associate Members

Detroit Police Lieutenants &
Sergeants Association

JAMES PALMER

Parliamentarian

Wisconsin Professional Police
Association

In September 2024, the Government Accountability Office (GAO) issued a deeply troubling report on the PSOB Program: [Report to Congress, Public Safety Officers' Benefits \(PSOB\) Program: Transparency, Claims Assistance, and Program Management Improvements Needed](#). The report documents many of the Program's longstanding deficiencies and shows that PSOB has failed to recognize the harm those deficiencies cause claimants.

NAPO has been acutely aware of these deficiencies for far too long. Over the past decade, we have worked with Congress to enact four laws that improve the PSOB Program's transparency and accountability and expand eligibility for

WILLIAM J. JOHNSON, CAE

Executive Director and

General Counsel

death and disability benefits: the Public Safety Officers' Benefits Improvement Act of 2017, the Safeguarding America's First Responders Act of 2020, the Protecting America's First Responders Act of 2021, and the Public Safety Officer Support Act of 2022. Although PSOB has implemented provisions that expand benefit eligibility, the GAO found that it has failed to carry out many of the transparency and accountability requirements included in these Acts.

The PSOB Program must act immediately to implement the recommendations of the September 2024 GAO report to improve transparency, claims assistance, and overall program management, without exception.

Officers catastrophically injured in the line of duty and the families of officers who died in the line of duty continually ask NAPO for help with claims that have remained unresolved for three or four years—and, in some cases, as long as twelve years—without any explanation for the delay. Treating these officers and families in such an abhorrent manner is unacceptable.

The PSOB Program must communicate clearly with claimants and their authorized representatives. It should explain where each claim stands, identify any issue delaying the determination, and proactively request any additional information or documentation that could move the claim forward. A claim should not remain “with legal” for months without an explanation of what is being reviewed or why the review is taking so long.

In an August 10, 2026, letter, Associate Attorney General Stanley Woodward Jr. asked NAPO to help the PSOB Program obtain necessary information from agencies that had not completed Part B of death benefit claims. We welcomed the opportunity to help advance these claims, especially because some have been pending since 2019—an indefensible delay. PSOB must establish processes that prevent incomplete claims from lingering without action, including clear guidelines for when to seek assistance from stakeholders such as NAPO and when to exercise the subpoena authority granted by the Protecting America's First Responders Act to compel an agency to submit Part B.

Additionally, NAPO urges the PSOB Program to clarify and publicly post the standards used to determine eligibility for disability benefits. Published standards would promote consistency across claims and help claimants and their representatives assess whether a case may qualify for benefits. In particular, the Program must explain how it defines "gainful work," a standard amended by the Protecting America's First Responders Act of 2021 (Public Law 117-61) that remains unclear.

The PSOB Program has not issued implementing regulations for either the Protecting America's First Responders Act or the Public Safety Officer Support Act of 2022 (Public Law 117-172), despite the significant changes both laws made to the Program. Without regulations explaining how PSOB will implement these amendments, claimants, law enforcement agencies, and the organizations that serve them have little insight into the claims decision-making process. We urge OJP to publish proposed regulations for public comment implementing these laws and the Honoring Our Fallen Heroes Act of 2025 (Public Law 119-60).

Lastly, the PSOB Program must expedite claims processing for officers already certified for benefits through the World Trade Center Health Program (WTCHP) or the September 11th Victim Compensation Fund (VCF) to ensure 9/11 responders and survivors receive timely benefits without duplicative review.

The PSOB Program is a vital lifeline for officers and families who have experienced a devastating tragedy. Greater transparency and accountability are essential to ensuring that the Program fulfills Congress's intent: to honor and support officers and their families who have sacrificed so much in service to their communities.

We respectfully urge you to work with us to improve the PSOB Program and ensure that the survivors of law enforcement officers killed in the line of duty and officers catastrophically injured in the line of duty are provided every available resource and benefit in a timely and transparent manner.

Thank you for your consideration of our written comments and for the opportunity to participate in the October 13, 2026, PSOB listening session. If NAPO can provide any additional information or assistance, please do not hesitate to contact me at (703) 549-0775 or bjohnson@napo.org.

Sincerely,

A handwritten signature in dark ink, appearing to read 'William J. Johnson', followed by a long horizontal flourish.

William J. Johnson, Esq.
Executive Director