

**WRITTEN COMMENT ON BEHALF OF COMMON CAUSE NEW YORK RE:
NEW YORK CITY'S CONFLICTS OF INTEREST BOARD (COIB) PROPOSED RULE
CHANGE TO THE DEFINITION OF "SUBSTANTIAL POLICY DISCRETION" TO THE
CITY CHARTER AND ADMINISTRATIVE CODE**

April 12,2024

Relevant to: City Charter Sections 2604(b)(12) and 2604(b)(15) and City Administrative Code Section 12-110.

Common Cause New York supports the COIB's proposed rule changes to both the City Charter and Administrative Code. These changes codify existing practice and streamline timelines and procedures to provide clarity to the process.

We also support our colleagues' recommendations to require policymaker data be released as open data with uniform data standards to ensure ease of use for members of the general public.