



Testimony to the New York City Conflicts of Interest Board (COIB) on Proposed Rules Regarding Contract Filers

Re: Strengthening clean contracting disclosures

July 22, 2025

Thank you for the opportunity to submit written testimony for this hearing. Reinvent Albany advocates for transparent and accountable government in New York.

We support the intent of the Conflicts of Interest Board's (COIB) [proposed rules](#) to make the Administrative Code and existing Procurement Policy Board rules on contract filers more consistent. However, we urge the Board to make additional changes to ensure city agency staff with higher risk continue to file disclosures given past scandals and irregular permitting activities.

We support the following changes in the proposed amendments:

1. **Aligning contract filers with city matters as described in the administrative code.** We also support the use of defined titles such as: agency chief contracting officer, deputy agency chief contracting officer, chief financial officer, or chief operations officer. We see no issue with excluding individuals that handle as-of-right development certifications, gifts to the city, and the settlement of legal claims against the City.
2. **Excluding those solely involved in micropurchases of \$20,000 or less.** As stated in [Board minutes](#) discussing this change, acceptance of kickbacks for city purchases of any level is already illegal, whether or not the individual files financial disclosure statements.
 - a. However, we urge COIB to consider still requiring financial disclosure statements from the individual handling micropurchases if the aggregate amount of purchases reaches a certain threshold. In determining the right threshold, we urge COIB to consult with the Mayor's Office of Contract Services and Procurement Policy Board to determine the appropriate dollar amount. Amounts could be pegged to existing triggers; for example, VENDEX questionnaires are required to be submitted by contractors after reaching an aggregate of \$250,000 in purchases.

We also ask that COIB make the following changes or clarifications:

1. **Ensure that “permits” beyond those related to zoning are covered under the regulations.** For example, we know that an NYPD “permit” is what was used by towing companies – including Mike’s Heavy Duty Towing, which was [involved in a major bribery scandal](#) – to be selected to operate on segments of NYC highways. Per [reporting in The City](#):
“The system for designating who gets these permits, however, is unusual. There’s none of the traditional competitive bidding. Instead applicants seek a permit from a small committee appointed by the NYPD that reviews applications and assigns segments to companies based on a point system.”
2. **Consider better defining what types of “recommendations” on actions trigger contract filer requirements, rather than eliminating this category altogether.** We understand that there may be technical recommendations made by agency staff for the selection of certain vendors based on their past experiences with services or products. However, we are concerned that bad actors engaged in pay-to-play schemes may seek to exert influence over contracts through a “recommendation” process where staff are asked to influence agency contracting. Should any of these individuals not be covered by existing financial disclosure rules for policymakers under § 12-110(e) of the Administrative Code, there should be some mechanism to require disclosure of their outside business dealings.

Thank you again for the opportunity to submit testimony. Please send any follow-up questions to Rachael Fauss at rachael [at] reinventalbany.org.