



Testimony to the New York City Conflicts of Interest Board (COIB) on Proposed Rules Regarding Reporting of Travel Payments

***Re: Greater reporting of city travel payments should come with
more fundraising disclosures for public servants, not less***

September 16, 2025

Thank you for the opportunity to submit written testimony for this hearing. Reinvent Albany advocates for transparent and accountable government in New York. Our testimony covers two areas of interest in the regulations: (1) reporting of travel payments, and (2) fundraising by city employees.

Travel Payments

We appreciate that the Conflicts of Interest Board's (COIB) [proposed rules](#) seek to address public concern about city employees accepting private funding for travel expenses. In our [testimony from March 2020 to COIB](#), we asked the COIB to prohibit travel expense payments by corporations or nonprofits. Ultimately, a ban on travel payments was not adopted by COIB, [per its position](#) that it was "counter to...decades of Board practice."

We find COIB's position on this issue disappointing. "We have always done it this way" is not persuasive given the various travel-related scandals that occurred during the [Eric Adams administration](#). Given the large number of [press accounts](#), we think it is obvious that special interests are attempting to influence city officials by paying for their travel, which is of substantial value that does not count as a campaign contribution or personal gift.

That said, we strongly support your proposal to expand disclosure requirements, specifically:

1. **Reducing the agency reporting threshold of travel contributions from \$5,000 to \$1,000** to make them consistent with gift reporting in the annual disclosure law.
2. **Technical changes** that:
 - a. travel expenses must be consistent with "government-class travel,"

- b. approval by agency heads be in writing, and
- c. clarifying that the individual or firm providing the expense payments must not have matters before the public servant.

COIB should clarify that it is not permissible to solicit or accept travel payments

We ask that COIB clearly state that it is not permissible for a public servant to *solicit* or *accept* payments from a firm or individual with matters before the public servant. COIB's proposed changes only mention *solicitation*.

Fundraising by city officials in their government role and on taxpayer-funded time should be reported

We oppose COIB's proposal to eliminate reporting by agencies of the names of not-for-profit organizations that were beneficiaries of fundraising by agency employees on agency time for two reasons:

1. **We disagree that the reports are “of limited utility.”** While COIB believes that they are not useful to public servants, they are of interest to the public. Indeed, Reinvent Albany frequently receives inquiries from reporters and other members of the public about nonprofit fundraising by city employees, and frequently reviews the lists of designated nonprofits.
2. **The reports of nonprofit fundraising by city employees should be made more useful rather than eliminated altogether.** Currently, only the names of nonprofits are listed in [spreadsheets published by COIB](#) – not the level of fundraising that occurred. If COIB is interested in ensuring its regulations fulfill its mission of providing high-value information to the public about potential conflicts of interest, it should increase the level of disclosure with the specific amounts raised for nonprofits by city agency staff.

Additionally, the regulations strike “in writing” from §1-14(b), which currently requires that agency heads designate not-for-profit organizations for solicitation by city employees. We do not see why it is useful to create ambiguity regarding how designations are made. Would this revision, for example, allow a designation to be made orally from an agency head to a city employee? We ask that “in writing” be retained to ensure that there is a paper trail regarding approvals of fundraising by public servants.

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