

Chris Hammer

From: Mirabella, Andreaana (EEPC) <AMirabella@eepc.nyc.gov>
Sent: Tuesday, June 23, 2026 3:55 PM
To: COIB Rules
Cc: Pan, Jimmy (EEPC)
Subject: Fw: COIB Notice: Extension of Public Comment Period on Proposed Rules Regarding Donations and Gifts to the City
Attachments: COIB Extension of Comment Period - Proposed Amendment of Rules Relating to Acceptance and Reporting of Donations.pdf

The NYC Equal Employment Practices Commission (“EEPC”) would like to take this opportunity to comment on the Conflict of Interest Board’s (“COIB”) proposed rule changes regarding donations and gifts to the City.

The EEPC serves as the independent oversight entity tasked with monitoring the equal employment practices of City agencies and entities. We currently have a headcount of 14 employees, and have historically operated with less. Despite the importance of our Charter-mandated work, the EEPC operates with the smallest budget of any City agency. We ask the COIB to consider that there are other agencies in the City similar to the EEPC operating with meager budgets where there would be no possibility of staff participating in any work-related activity outside of the office if the agency relied solely on its Other Than Personal Spending (“OTPS”) budget.

There may, for example, be an opportunity for EEPC staff to attend an integral training, or otherwise be a panelist directly related to the work of the EEPC, where, were it not for the third party’s offer to fund the associated costs of attending such function, the EEPC would be unable to participate. When you are part of an agency with such a small OTPS budget, it may frustrate the overall mission of the agency to not accept offers of assistance from third parties.

Likewise, calling it a “gift” to a City employee, rather than categorizing it for what it is, like payment by a third party for travel-related expenses, is somewhat of a mischaracterization. So long as the travel and attendance at the event are related to official City business, it is arguably not a true “gift” to the employee.

We applaud the COIB in its efforts to increase transparency when it comes to public servants accepting travel-related expenses by non-government entities, but the way in which such transactions are classified, particularly when it comes to small agencies with limited budgets, should be considered.



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From: Chris Hammer <Hammer@coib.nyc.gov>
Sent: Wednesday, April 22, 2026 1:00 PM
To: Chris Hammer <Hammer@coib.nyc.gov>
Cc: Ethan Carrier <Carrier@coib.nyc.gov>
Subject: COIB Notice: Extension of Public Comment Period on Proposed Rules Regarding Donations and Gifts to the City

Good afternoon,

The Conflicts of Interest Board announces an extension of its public comment period and second public hearing on proposed rules regarding donations and gifts to the City. Please see the attached Notice, which is published in today's *City Record*.

Sincerely,

Christopher M. Hammer (he/him)
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