

## **Fire Department of The City Of New York Comments to Proposed Rules Regarding Donations and Gifts to the City.**

The New York City Fire Department (FDNY) has some concerns regarding the proposed amendments to the City's travel rules and their potential impact on the Department's ability to fulfill its mission.

For FDNY, third-party-funded travel is most often supported by nonprofit organizations rather than private corporations. A substantial portion of such travel is funded by the FDNY Foundation, a nonprofit organization that is officially affiliated with and dedicated to supporting the Department. Travel funded by the FDNY Foundation does not present the type of concern contemplated by the proposed rule regarding "special interests" seeking to influence City officials. Rather, this support enables FDNY personnel to participate in critical training programs, professional development opportunities, conferences, and educational events that the Department would otherwise be unable to fund within its existing budget constraints.

Similarly, organizations such as the National Fire Protection Association (NFPA), a nonprofit organization that develops nationally recognized fire and life safety standards, have historically supported FDNY participation in programs that directly benefit public safety and emergency preparedness.

Beyond these longstanding nonprofit relationships, third-party-funded travel frequently occurs when FDNY members are invited to speak at conferences, training programs, and professional forums. These opportunities allow Department personnel to share FDNY's expertise in firefighting, emergency medical services, emergency management, and disaster response while also engaging with peer agencies, researchers, and subject matter experts from around the world. Such exchanges promote the dissemination of best practices and foster collaboration across the fire service and emergency response community.

FDNY's third-party-funded travel is already subject to extensive review and oversight. Requests are reviewed by the Department's Deputy Commissioner for Management and Budget, FDNY Legal Affairs, the Fire Commissioner, and the Office of the Mayor's Counsel. While the Department would support reasonable measures to enhance transparency and disclosure, additional requirements should be carefully balanced against the practical benefits these travel opportunities provide. Excessive restrictions may inadvertently discourage participation in valuable training and professional development programs that directly contribute to public safety.

A complete prohibition on third-party-funded travel would have particularly significant consequences. FDNY does not have sufficient City funding to absorb the costs currently covered by nonprofit organizations and conference sponsors. As a result, many beneficial training, educational, and speaking opportunities would no longer be available to Department personnel.

These travel opportunities also serve an important public purpose by allowing FDNY members to educate the global fire service about FDNY's experiences during and after the terrorist attacks of September 11, 2001. Through these presentations and engagements, FDNY shares lessons learned

in emergency response, incident command, firefighter safety, resilience, and recovery that continue to inform fire departments and emergency management organizations worldwide.

At the same time, participation in national and international conferences enables FDNY personnel to learn about emerging technologies, innovative operational practices, evolving training methodologies, and new approaches to emergency preparedness being implemented by fire departments and public safety agencies across the country and around the world. Bringing this knowledge back to New York City strengthens FDNY's operational capabilities, reinforces the Department's leadership role within the fire service, and enhances the City's overall preparedness and resilience in the face of future emergencies.

For these reasons, FDNY respectfully urges the Board to consider the unique nature of nonprofit-supported travel and the substantial public benefits it provides when evaluating any amendments to the City's travel rules.

Finally, for the Fiscal Year of 2026 FDNY has accepted approximately \$24,000.00 in gifts of travel expenses from various 3<sup>rd</sup> parties. This is about normal for a 12 month period.