



Human Resources
Administration

Department of
Homeless Services

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Office of Legal Affairs
Employment Law Division

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150 Greenwich Street
New York, NY 10007

February 19, 2020

Via email only

Ethan Carrier
General Counsel
New York City Conflicts of Interest Board
2 Lafayette Street
New York, NY 10007

Re: **COIB Rule 1-13(e)(1): Designation of NYC Department of Social Services Employee to Perform Work with Not-for-Profit Entity**

Dear Mr. Carrier:

Pursuant to Rule 1-13(e)(1) of the Rules of the Conflicts of Interest Board, I, as Commissioner of the New York City Department of Social Services ("NYC DSS"), have designated Dr. Edith Kealey to perform work in her official NYC DSS capacity as Treasurer of the National Association of Welfare Research and Statistics ("NAWRS") Board of Directors.

Dr. Kealey currently serves as Research Director (formal title: City Research Scientist IV) within the Office of Evaluation and Research ("OER"), commencing October 14, 2014. In that capacity, she works with the Deputy Commissioner of OER to plan and manage the DSS/HRA/DHS research and evaluation agenda; she directs and implements major program evaluations and research studies to inform agency priorities and programming; she serves as an agency expert on evaluation and research methods and activities; she oversees day-to-day evaluation and research operations, including supervising a team of seven Senior Research Scientists and Research Scientists; and she provides coverage with full decision-making authority when the Deputy Commissioner is unavailable. Dr. Kealey's normal work schedule is 8 am to 4 pm, Monday through Friday.

Dr. Kealey holds a secondary position as the Treasurer of the National Association of Welfare Research and Statistics (NAWRS). NAWRS is a non-profit association designed to promote the exchange of ideas on how research and statistical analysis can contribute to the development and administration of effective human services programs. The membership includes researchers and analysts from federal, state, and local government, as well as from universities and prominent national research organizations.

It should be noted that NAWRS does not have contracts with the City. HRA/DSS does has a long history of participating in NAWRS research, and DSS Office of Evaluation and Research staff have previously served in voluntary leadership roles in the organization.

Furthermore, Dr. Kealey is not compensated for her work in this voluntary position as Treasurer of the NAWRS. The expected parameters of her role as Treasurer are described as follows:

1. The Treasurer is elected to serve for a term of two years and is an Officer of the Board.
2. The Treasurer is expected to attend monthly Board meetings and monthly meetings of the Finance Committee. These meetings last approximately 2 hours each and are conducted by phone.
3. The Treasurer is also expected to attend the bi-annual NAWRS Workshop. This is a multi-day conference held every other year in a major U.S. city.
4. Responsibilities of the Treasurer according to the NAWRS By-laws include:
 - a. Collecting, banking, and dispersing funds;
 - b. Providing quarterly financial statements and bank statements to the Board (accomplished by working with a CPA contracted with NAWRS);
 - c. Filing required IRS tax forms (accomplished by working with a CPA contracted with NAWRS); and
 - d. Working with the Registrar to manage the workshop registration process.

Dr. Kealey is requesting to use a *de minimis* amount of City time and resources (including computer and phone resources, but not City letterhead) to fulfill these responsibilities. She is requesting to spend an average of up to five hours of Agency time per month towards her position with NAWRS, at a little over one hour per week. She expects that this time would be spent in the following manner:

- Running a monthly 2-hour Board meeting (conference call, through a line set up by another Board member);
- Preparing for the Board meeting, including developing the agenda through email consultation with other members (1 hour);
- Participating in a monthly 1-hour call for other NAWRS business (e.g., Program Committee meetings); and
- Miscellaneous Board business conducted largely through email, including communication with our web designer, insurance company, sponsors, and other officers (1 hour).

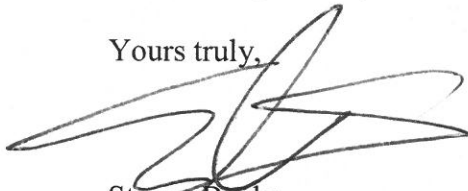
To engage in the above-mentioned tasks, Dr. Kealey would use the Agency computer and phone, and on rare occasions, she would use the Agency printer

and scanner. She would also use her HRA/DSS email account for most of her communications in her position with NAWRS, with her work email address, phone number and HRA/DSS work address listed with her name on the NAWRS website on the Board of Directors page ([see https://nawrs.org/](https://nawrs.org/)). She would use her Agency contact information in this manner because NAWRS by-laws require the NAWRS Treasurer (and two-thirds of all Board members) to be employees of a state or local government human services agency in a field related to research and statistics. Dr. Kealey has acknowledged that she cannot use HRA/DSS letterhead on behalf of NAWRS.

Upon review of the forgoing, Dr. Kealey's limited usage of Agency time and resources in pursuit of her work with NAWRS furthers the purposes and interests of the City. NAWRS provides a forum for Dr. Kealey to connect with individuals doing research and evaluative work at other city/state social service agencies and to learn from their efforts. The knowledge gained through this work will enhance her ability to oversee the agency's research and evaluation agenda in her position as Research Director of OER, and to work with her OER team through program evaluation, primary research studies, and syntheses of existing research. Her work with NAWRS also provides an important forum for highlighting NYC DSS's commitment to continually enhancing human services delivery through evidence-informed practice.

Based upon the information presented to me, I have determined that there is a demonstrated nexus between Dr. Kealey's position with HRA/DSS and her activity with NAWRS, and that such activity furthers DSS's mission and is not undertaken primarily for the benefit or interest of NAWRS.

Yours truly,

A handwritten signature in black ink, appearing to be "Steven Banks", written over a horizontal line.

Steven Banks
DSS Commissioner

cc. Kinsey Dinan, Deputy Commissioner, OER