



Testimony to the NYC Report and Advisory Board Review Commission on Review and Elimination of Reports

January 9, 2023

Thank you for giving us the opportunity to comment on the reports being considered for waivers by the [Report and Advisory Board Review Commission](#) (the “Commission” or RABRC). Reinvent Albany advocates for transparent and accountable government in New York, and is particularly interested in making city government more transparent. We were instrumental in passing the city’s [Open Data Law](#) and [subsequent amendments](#) and advocating for OpenFOIL legislation which led to the creation of the City’s [OpenRecords](#) platform.

RABRC’s Work is Part of the Continuous Improvement of Government

As we [testified to the Commission in 2018](#), we support the mission of RABRC, which was approved by the voters after being placed on the ballot in 2010 by the City Charter Revision Commission. We support open government, transparency, and efficient and effective government – an important component of which should include continuous improvement. It is good policy to periodically review reporting requirements to determine if they are relevant, useful, and/or have been supplanted by open data, and therefore a waste of taxpayer dollars and government staff time.

New York City government needs to shift away from writing “reports” and towards “reporting” information, especially in the form of automatically updating datasets published in the City’s Open Data portal. The more open data becomes a normal part of government reporting, the more time and money agencies and the public will save by not needing to produce episodic reports or handle FOIL requests.

Support for Removing Archaic Reporting Requirements

Reinvent Albany sees no reason to retain archaic reporting requirements for data which is no longer collected, or where the mission of the agency has changed and it no longer has responsibility over programs. Reinvent Albany supports eliminating the following reporting requirements in this category:

- Shipboard Gambling Report, (Administrative Code §20-9017)
- Seafood Distribution Areas/Fulton Fish Market Report, (Administrative Code §22-226)
- Report on Other Wholesale Markets, (Administrative Code §22-269)

- Article 214 Closings Report, (Administrative Code §28-214.1.6)

Support for Removing Requirements Where There is Open Data

We were pleased to see consideration and acknowledgement of where there is already existing data on the Open Data portal. Where Open Data has fully replaced the need for a separate reporting requirement, agency staff should not have to produce episodic, stand alone reports. We support RABRC eliminating the following reporting requirements that are already met through other online databases, and ask RABRIC to emphasize that it wants the data reporting to continue – but not as a separate report:

- Monthly Report on Directory Assistance Calls, (Charter §1075(c)) – on Open Data portal
- Monthly Report on Service Request Calls, (Charter §1075(b)) – on Open Data Portal
- Small Purchases Report, (Charter §314(b)) – in CheckBook NYC and PASSPort
- Worker Cooperatives Contracts Report, (Administrative Code §6-139(b)– in CheckBook NYC and PASSPort

Further Review Needed Where Data Would Otherwise Not be Available

Three reporting requirements are proposed to be waived that contain data that would not otherwise be produced:

- Semiannual Report on Heads of Household Aged 16-20, (Administrative Code §21-134(c))
- Report on Preferred Source Procurement, (Administrative Code §6-136(b))
- Report on Site Safety Managers and Coordinators, (Administrative Code §28-103.31)

We do not have expertise on data related to heads of households or site safety, but urge RABRC to reach out to organizations concerned with these issues to determine if the data is still useful and/or relevant.

Regarding preferred source procurement, we urge RABRC to retain this reporting requirement, or recommend the City Council modify it. This data would not otherwise be made available, and non-competitive procurements have a greater risk of corruption and abuse. Data on the cost of individual products is important to understanding what the market rate of goods are, and in general the City should be striving toward having standard unit costs for products. This ensures that taxpayers are getting the best deal for goods and services.

Please Do Not Remove Reporting Requirements on Pedestrian Safety without Consulting Stakeholder Groups

Lastly, we urge RABRC to reach out to transportation and pedestrian safety advocacy organizations to better understand the utility of the reports below, which touch on pedestrian safety:

- Bollards Installation Report, (Administrative Code §19-189.1)
- Interagency Roadway Safety Plan, (Administrative Code §19-184(d))
- Neighborhood Slow Zones Report, (Administrative Code §19-177(d)(2))

We understand that the [Bollards Installation Report](#) lacks the important context that is provided in Vision Zero reports, but note that the data does not appear to be otherwise available on the Vision Zero website or on the Open Data portal. This reporting requirement is relatively new, from Local Law 80 of 2018. RABRC could request elimination of the separate, stand alone reporting requirement, while requesting that the specific data bollard installation data be merged into existing Vision Zero reports.

Regarding the Neighborhood Slow Zone report, the lowering of the citywide speed limit to 25 mph does not render reporting on 20 mph Slow Zones outdated, as the Vision Zero Corridors are a different policy matter. However, we understand that the Department of Transportation is not implementing new Slow Zones at this point. We note that there has been [criticism that Slow Zones did not significantly affect safety because the implementation was poor](#), and only limited traffic calming tools were used.

Lastly, we understand the rationale that the Interagency Roadway Safety Plan has been surpassed by interagency Vision Zero efforts and the work that DCAS does on fleet management, but again urge RABRC to consult with organizations with expertise in this area before it makes an ultimate determination.