

**Report and Advisory Board Review Commission
“Improving Government Efficiency by Streamlining the City’s
Reporting and Advisory Board Requirement”**

Testimony of the Mayor’s Office of Criminal Justice

MARCH Report

**Testimony presented by Nora Daniel
September 28, 2022**

Good afternoon, Commissioners of RABRC. My name is Nora Daniel, and I am the Chief of Staff for the Mayor’s Office of Criminal Justice (MOCJ). I’m testifying on behalf of the Mayor’s Office of Special Enforcement (OSE), which is embedded within MOCJ. OSE is an innovative, solutions-oriented task force that ensures NYC communities are safe from harmful illegal and unregulated industries that one agency and one set of enforcement tools alone can’t address. OSE is a multi-agency enforcement team that devises strategic solutions—ranging from public education to enforcement action—to complex problems.

OSE’s mandate, originating from a Mayoral Executive Order in 2006, is to coordinate efforts across City agencies to problem-solve around emerging issues adversely affecting neighborhood cohesion, livability, and safety. The vast majority of OSE’s work since 2015 has related to addressing illegal short-term rentals occurring in the city’s permanent residential housing stock.

In 2019, the New York City Council passed Intro 1156, which became Local Law 220 of 2019. Local Law 220 amends the administrative code to require OSE to submit to the Council and post on its website a quarterly report that details “inspections of nightlife establishments overseen by the office of special enforcement.” OSE does not oversee inspections of nightlife establishments as contemplated by Local Law 220. For the past three years, OSE has reported no inspections.

Per Charter Section 1113(e) (1), the Report Advisory Board Review Commission (RARBC), must review reporting requirements for their utility, duplication, relevance and

value. The overarching goals of the commission are government efficiency, efficacy, and transparency. Please allow me to elaborate on LL 220's utility, duplication, relevance, and value.

Utility: Local Law 220 does not provide useful information for the City Council or the general public. Because OSE does not oversee inspections of nightlife establishments in the manner contemplated by the statute and has no plans to do so in the foreseeable future, reporting this information each quarter does not provide useful information.

Redundancy: The report is also somewhat redundant, because the Office of Nightlife within the Mayor's Office of Media and Entertainment currently provides reports on inspections of nightlife establishments on a bi-annual basis. **Relevancy:** The LL 220 report lacks relevance because the information provided in the report does not change, and is not anticipated to change in the near future.

Value: The LL 220 report does not provide value for its production. While reporting no inspections is not particularly onerous, the report does require some staff time, and waiving the report would allow OSE to redirect its efforts to endeavors that are more aligned with its core responsibilities.

To better achieve government efficiency, efficacy, and transparency, we request that RABRC waive the requirements of Local Law 220 that pertain to OSE. MOCJ and OSE do not foresee a time in the future when OSE will begin overseeing the nightlife inspections contemplated by Local Law 220. In addition, OSE is currently in the process of implementing Local Law 18 of 2022, which provides a new licensing structure for short-term rental properties in New York City. Local Law 18 will also require reporting on its provisions, which are relevant to OSE's current workstreams and practices. In addition to the LL 220 report and the upcoming LL18 reporting, OSE also submits an annual report on its short-term rental activities, captured in the report required by LL 87 of 2017. Waiving the Local Law 220 requirements that pertain to OSE would allow OSE to focus its reporting on the core activities and workstreams of its office, and would promote the government efficiency, efficacy, and transparency that are the goals of the RABRC. Thank you for the opportunity to testify, and I'm happy to answer any questions.