



**Response to the Preliminary Report of the Commission on Government
Efficiency
Public Hearing – Queens Borough Hall
July 13, 2026**

Chair Gaspard and members of the Commission:

Thank you for the opportunity to testify before you today. My name is Grace Rauh, and I am the Executive Director of Citizens Union, a nonpartisan good government group working for honest and accountable government and open and fair elections for nearly 130 years.

Citizens Union commends the Commission for a thoughtful Preliminary Report, especially for highlighting structural problems in our procurement system and offering ideas to ease burdens on small businesses. We thank the Commission and its staff for the depth of research reflected in the report and for the many hours of public testimony they solicited and reviewed across the five boroughs.

However, we believe the report misses key issues related to government reform, some of which were mentioned in several testimonies during the first hearing cycle. This testimony includes our feedback on the Commission's report.

Eliminating Outdated Reporting Requirements – Changes to the Report and Advisory Board Review Commission (RABRC)

We appreciate the Commission's focus on the excessive reporting requirements codified in the Charter and Administrative Code, which often serve limited, short-term functions, and support the goal of making mandated reporting more effective and useful.

While we agree that the RABRC has not led to a substantial number of requirements being waived, it is unclear whether that is the result of the RABRC's structure, power, or process, or simply the fact that it has been underutilized and deprioritized. To the extent that mayors believe agency reports have outlived their usefulness or impose operational burdens, they can already use the RABRC — which is chaired by a mayoral appointee and has majority mayoral appointments — to push for many more waivers. They have not done so.

The RABRC has not been convened since December 2024. In the years when the Mayor's Office of Operations actively pursued the RABRC process (2021 to 2024), the executive and legislative branches generally worked together to eliminate unnecessary requirements, proposing to waive 20 reports over four years. In 2012, the only other year the RABRC was active, it waived 7 reports and 8 advisory boards. These numbers are modest in absolute terms, but they demonstrate that the mechanism functions when the executive prioritizes it. It implies the low usage reflects a political choice rather than a structural limitation of the RABRC itself.

In other words, the current RABRC process can be used to propose scores of other reporting requirement waivers.

The reports flagged for RABRC review are selected by the agencies that produce them, which cuts both ways. It may mean the reports chosen are genuinely the ones most burdensome to professional staff, but it could equally mean agencies are proposing to shed the reports most inconvenient to them, regardless of their value to Council oversight or the public. This ambiguity is itself a reason for caution about expanding the RABRC's authority: a selection process driven by the agencies being overseen, housed in a body with a mayoral majority, is not a neutral filter suited to binding, final decision-making.

The proposal to make RABRC determinations binding and final ("A Stronger RABRC," report p. 58) would give the executive unilateral authority to override reporting legislation without a Council disapproval window, since the mayor holds a majority on that commission. This would constitute an unnecessary intrusion into the legislative branch's prerogatives.

Using the RABRC more effectively could allow city government to address the reporting requirements that are most ineffective or burdensome, and to relieve real choke points in agency operations. But it will not directly reduce the number of new reporting requirements the Council creates going forward. That growth is rooted in political dynamics, structural incentives, and a media environment that rewards introducing and passing reporting-requirement bills — a problem shared by many jurisdictions.¹

To truly change this dynamic, other guardrails may need to be introduced at the point of legislation itself, and the automatic sunsets on new reporting requirements included in the Commission's report is one idea worth exploring. However, such a change would be a substantial departure from how legislation is currently enacted and how the City Council operates internally, given that the body would need to periodically consider re-approving the requirements. It should not be taken lightly, and any such proposal must incorporate input from the legislative body itself.

Ethics and Accountability: Strengthen Money-Saving Watchdog Agencies

Citizens Union continues to urge the Commission to guarantee minimum budgets for the Department of Investigation (DOI) and the Conflicts of Interest Board (COIB), as we proposed in our June testimony.

Years of ethical scandals at City Hall have left oversight agencies underfunded and anti-corruption work behind. Just last month, the DOI's Annual Anti-Corruption Report found serious problems with how city government conducts internal audits, with 30% of agencies lacking any audit staff, exposing weaknesses in the City's ability to identify signs of waste, fraud and abuse.²

Raising such crucial corruption risks is precisely why the work of DOI is essential for the well-being of New York City Government. But the agency cannot fulfill this mandate while constrained under years-long budget challenges, problems so acute they have led DOI Commissioner Nadia Shihata to take the rare step of testifying before this Commission to ask for budget protections.³

¹ See for example, Congressional Research Service. Congressionally Mandated Reports: Overview and Considerations for Congress. <https://www.congress.gov/crs-product/R46357>

² New York City Department of Investigation 2025 Annual Anti-Corruption Report <https://www.nyc.gov/assets/doi/reports/pdf/2026/13AnnualAntiCorrRpt.Release.06.17.2026.pdf>

³ Testimony Of Nadia Shihata Concerning Recommendations to Further Protect The Independence of the New York City Department Of Investigation https://www.nyc.gov/assets/doi/Testimony/2026/CharterRevisionTest_6.30.26_FINAL.pdf

This is not a new or untested idea. The Commission to Strengthen Local Democracy - the charter commission established by the City Council in 2025 - devoted extensive attention to this exact question and developed charter amendments, already vetted by the Law Department, that would set minimum funding levels of 0.06 percent of the city's total budget for DOI and 0.0035 percent for COIB.⁴ That prior commission's research demonstrated that these agencies more than pay for themselves: DOI alone generated over \$6 million in financial recoveries last year, and COIB's same-day legal advice helps prevent costly violations before they occur.⁵ Underfunding these watchdogs is not fiscal discipline, and it costs the City more than it saves.

Given the extensive vetting this proposal has already received, adopting it would require little additional lift from this Commission. We respectfully ask the Commission to include minimum budget protections for DOI and COIB in its final report.

Modernizing Government Technology: In-House Capacity Over Procurement Reform Alone

We are encouraged that the Commission is exploring specialized procurement methods for government technology. However, while technology procurement should be addressed, it is not the end-all, be-all solution, and the Commission must continue to frame the City's technology issues as one that needs much more work. Reforming technology procurement is simply one piece of the puzzle.

Data from vendor-built applications is often siloed, and procurement streamlining will not deliver the data interoperability the City needs to run an efficient government. That capability comes from having technologists inside government. We are grateful that the Preliminary Report gave serious attention to further exploring in-house innovation and "digital sovereignty," citing the federal 18F model as a template for how New York City might build technology capacity directly rather than continuing to route it through vendors. This is the direction Citizens Union, alongside other civic technology advocates, urged in our testimony.⁶

Other states are already showing what this looks like in practice, and the Commission may find it useful to encourage the City to look beyond the 18F model to states building this capacity today:

- New Jersey's Office of Innovation, launched in 2018, was codified into permanent law in January 2026 as the New Jersey Innovation Authority, making it the first state in the nation to enshrine a digital delivery team in statute. Working in-house across nearly every state agency, it has helped tens of thousands of residents access services and benefits more efficiently, building durable technical capacity rather than one-off contracts.⁷

⁴ The NYC Commission to Strengthen Local Democracy Final Report, https://static1.squarespace.com/static/678ab684e1a2cb193dfc38af/t/6930a3eb72d92366241d0693/1764795371419/FINAL_Report_12.3.25_w_appendices.pdf.

⁵ The New York City Department of Investigation, 2025 Annual Report; The New York City Conflicts of Interest Board, 2025 Annual Report.

⁶ Citizens Union, *Recommendations to the New York City Commission on Government Efficiency* (New York: Citizens Union, June 2026), <https://citizensunion.org/wp-content/uploads/2026/06/Citizens-Union-Recommendations-to-the-2026-NYC-Commission-on-Government-Efficiency.pdf>; Jordan Shapiro, "Testimony to the Commission on Government Efficiency, COGE, a Charter Revision Commission," BetaNYC, June 11, 2026, <https://www.beta.nyc/2026/06/11/coge-testimony/>; Robert Gordon, "The Wrong Kind of Outlier," June 16, 2026, <https://robertmgordon.substack.com/p/the-wrong-kind-ofoutlier>.

⁷ Matthew Fazelpoor, "Murphy Signs Law Creating New Jersey Innovation Authority," *NJBIZ*, January 5, 2026, <https://njbiz.com/murphy-signs-new-jersey-innovation-authority-law/>.

- Colorado's Governor's Office of Information Technology (OIT) has undertaken a public "strategic reset," moving to a pod-based delivery model and expanding the Colorado Digital Service, a team of in-house product managers, designers, engineers, and procurement specialists embedded directly with agencies to design, build, and buy technology as a coordinated, ongoing practice rather than a series of disconnected contracts.⁸

Both examples reflect models we encourage the Commission to recommend the city explore further as it considers how New York City can bring more of its technology capacity in-house.

Democracy and Elections: Address Massive Public Testimony on Primary Election Reform

Open primaries was one of, if not the most, discussed topics in testimony before the Commission. Our analysis found that it accounted for roughly 15 percent of all oral testimony. Yet, the Commission chose not to include any reference to this issue in its report – a break from past commissions, who have all acknowledged the public interest in the topic and offered their response.⁹ That level of sustained public interest should not be ignored.

Citizens Union reiterates our recommendation that New York City open its primary elections to all voters, regardless of party enrollment, while retaining party designations on the ballot so that voters retain relevant context about candidates. We made this case in our June testimony, and it remains, in our view, one of the most consequential democracy reforms available and the most effective way to accurately capture New Yorkers' voices in government.

The public agrees.

More than 1 million New Yorkers are registered as unaffiliated or independent voters - now nearly 22 percent of the city's registered electorate, more than twice the number of registered Republicans - and every one of them is currently locked out of a primary that, in the vast majority of races, is the only election that matters. This falls hardest on younger voters, who identify as independent at higher rates than prior generations do, precisely when the City should be lowering barriers to civic participation rather than raising them.

Reforming the Charter Revision Process Itself

Finally, we want to speak directly to the Commission's own experience over these six weeks. We appreciate you and your staff's hours of hearings across all five boroughs, bringing together more than 650 attendees, 145 witnesses, 258 written submissions, and a Preliminary Report.¹⁰

But we would be doing a disservice if we did not say plainly that the circumstances under which the Commission was asked to do this work were unfair - to the Commissioners, and to the New Yorkers whose input deserved more time than this process allowed. This Commission, like the 2024 Charter

⁸ "OIT Announces Strategic Realignment to Better Serve Coloradans and Make State Government More Efficient," Colorado Governor's Office of Information Technology, May 27, 2026, <https://oit.colorado.gov/press-release/oit-announces-strategic-realignment-to-better-serve-coloradans-and-make-state>.

⁹ See Preliminary Staff Report of the Commission to Strengthen Local Democracy, page 92-24; 2025 Charter Revision Commission Preliminary Report, page 60-64, 2024 Charter Revision Commission Preliminary Report pages 47-50.

¹⁰ See more at Charter Reforms for Better New York City Government - Citizens Union report for the 2025 Charter Revision Commissions <https://citizensunion.org/wp-content/uploads/2025/02/Charter-Reforms-for-Better-New-York-City-GovernmentCitizens-Union-Report-Feb-2025.pdf>

Revision Commission before it, was compressed into roughly a two-month working period during the summer and election season, among the shortest charter revision timelines in the city's history. Public hearing cycles were held at record-breaking speed, with less than three weeks from their announcement to the culmination of the first cycle.

A commission tasked with reexamining fundamental questions of city governance should not be allowed to work for only eight or nine weeks. It is then constrained in a process that gives it too little runway, forces it to depend mostly on agency-based recommendations, and limits public debate.

That is why Citizens Union continues to call for structural reform of the charter revision process itself: minimum timeframes of at least 180 days between a commission's first meeting and the filing of ballot proposals, at least 30 days between a final report and ballot filing, and codified public hearing and transparency requirements. We have included more details in our earlier written testimony.¹¹

Last month, a Buffalo Charter Revision Commission approved ballot proposals to regularize and reform the city's charter commission process.¹²

We urge the Commission to address the process reforms in its final report so that no future commission is asked to do this important work under such unfair constraints.

¹¹ Citizens Union, *Recommendations to the New York City Commission on Government Efficiency* (New York: Citizens Union, June 2026), <https://citizensunion.org/wp-content/uploads/2026/06/Citizens-Union-Recommendations-to-the-2026-NYC-Commission-on-Government-Efficiency.pdf>.

¹² Approved Proposals for Referendum, "City of Buffalo Charter Revision Commission, City of Buffalo, NY, accessed July 9, 2026, <https://www.buffalony.gov/1907/Approved-Proposals-for-Referendum>.