



CITY OF NEW YORK CONFLICTS OF INTEREST BOARD

2 Lafayette Street, Suite 1010
New York, New York 10007
(212) 442-1400; (212) 437-0705 (Fax)
www.nyc.gov/ethics

Milton L. Williams Jr.
Chair

Wayne G. Hawley
Board Member

Ifeoma Ike
Board Member

Stephen Loffredo
Board Member

Amy E. Millard
Board Member

Carolyn Lisa Miller
Executive Director

Ethan A. Carrier
General Counsel

Jeffrey Tremblay
Director of Enforcement

Katherine J. Miller
*Director of
Annual Disclosure &
Special Counsel*

Alex Kipp
*Director of
Education & Engagement*

Tasnia Karim
*Director of
Administration*

Derick Yu
*Director of
Information Technology*

Testimony before the New York City Council Committee on Finance
and the Committee on Governmental Operations,
State & Federal Legislation
Concerning the FY27 Executive Budget

Carolyn Lisa Miller
Executive Director, NYC Conflicts of Interest Board
June 4, 2026

Good afternoon, Chair Lee and members of the Committee on Finance, and Chair Brewer and members of the Committee on Governmental Operations, State & Federal Legislation. I am Carolyn Miller, Executive Director of the New York City Conflicts of Interest Board. With me are Ethan A. Carrier, COIB's General Counsel, and Tasnia Karim, COIB's Director of Administration. We are here to offer testimony about the budgetary challenges facing COIB as the Council considers the City's budget for Fiscal Year 2027.

This is the first time in 10 years that COIB has been invited to offer testimony about its budget, and we appreciate the recognition by Chair Brewer and the committee members of the centrality of COIB to advancing ethics in City government, as well as the spotlight put on COIB's budgetary issues by the good government groups Citizens Union, Reinvent Albany, Common Cause, NYPIRG, and the League of Women Voters. The City's budget reflects its priorities, and over the past four years COIB has experienced a series of budget cuts that have reduced its staff and impeded its work, and we hope that this hearing is part of reversing that trajectory.

Since its creation in 1989 by the voters of the City of New York, COIB has strived, with its limited staff and budget, to provide the best possible services to the current and former public servants who are the agency's constituency. Each year, COIB answers thousands of questions through its Attorney of the Day service, helps almost 10,000 filers complete their annual disclosure reports, educates hundreds of thousands of public servants with creative, entertaining content, and, when necessary, prosecutes violations of the City's conflicts of interest law.

COIB is able to provide all those services – and more – with a tiny staff. In 1991, its first full year in operation, COIB had a staff of 21. Today, COIB has a staff of 22. In the

intervening 36 years, COIB's workload has only increased, without the resources to match. COIB has been entrusted with a series of additional responsibilities, most recently the regulatory and reporting requirements of the Legal Defense Trust Law. COIB also serves an expanded City workforce, from around 240,000 in 1990 to over 320,000 today, plus all former public servants.

Today, I will address the three key budgetary challenges facing COIB: staffing levels, pay parity, and IT infrastructure.

1. Staffing Levels

In January 2022, COIB had a staff of 26. During the prior administration, when an employee left, COIB was denied authority by OMB to fill the vacancy. The vacant position was removed from agency headcount, and COIB was required to advocate for that position as a "new need," a process that placed COIB in the position of trying to convince OMB that our work was important. The current administration has already taken a different approach, and the Executive Budget includes funding for COIB to hire two new paralegals. These two paralegals will be incredibly valuable to our agency's work, as COIB has been functioning with only one paralegal – supporting three separate legal units – since March 2022. The remaining staffing need is the vacancy (since January 2025) in our Legal Advice Unit (\$95,000); being able to hire another Advice attorney would help the Board fulfill its most critical mission of providing guidance to public servants to prevent conflicts of interest before they occur.

2. Pay Equity

COIB's entire PS budget (approximately \$2.8 million) is allocated to current staff salaries – that is, the agency has no funding to provide any salary adjustments or increases. This funding deficit has caused three problems. First, long serving and essential senior staff are undercompensated, stuck at salary levels from years ago that are substantially less than their counterparts at other City agencies. For example, a recent job posting for Deputy Chief in the Ethics & Compliance Division at the City's Law Department offered an incoming salary of \$215,254; the experienced and well-regarded Deputy General Counsel at COIB is currently earning 30% less (\$150,452), after almost 10 years at the agency. Second, COIB cannot address long-standing pay disparities among managers with comparable responsibilities. For example, COIB's IT Director, a 20-year agency veteran who alone manages the agency's IT infrastructure and often travels into the office on the weekend to trouble-shoot issues with our servers, earns 25% less than the highest-paid unit director. Third, COIB has been unable to adequately compensate the junior staff who successfully manage increased workloads resulting from decreased staffing levels. For example, COIB sought funding from OMB to provide its sole paralegal – the one doing the work of two paralegals – with a \$4,045 salary increase (8.1%) to bring her salary up to \$54,000. That request was denied, as were repeated requests for funding to achieve pay equity across the agency. These budgetary deficits put the agency in acute jeopardy of losing the key staff who we rely on to perform our Charter-mandated work. COIB seeks \$230,000 to address

senior staff salary issues and \$70,000 to address junior staff salary issues, for a total of \$300,000 in pay equity.

3. IT Infrastructure

The final budgetary challenge is one that impacts COIB directly and substantially, but over which COIB has almost no control. COIB's OTPS budget for Fiscal Years 2026 and 2027 is \$143,384, enough to rent copy machines and buy paper but not much else. As a result, COIB relies on OTI for its major IT projects but lacks the ability to direct a project's prioritization or completion. Currently, there are two such mission-critical projects: the development of a new annual disclosure filing application and the deployment of a new case management system. First, the current filing application was built in the early 2000s, and, as filers quickly realize, has many functional limitations. There have been discussions with OTI over the years about developing a new filing application, but the project has been stalled since 2023 when OMB did not approve funding. Second, the current case management system was rolled out to multiple City agencies in 2013 but quickly became outdated, and, since 2019, a group of agencies have been seeking approval from OMB every year for funding for a new case management system. That approval seems finally to be in place, but until a date is set for migration of our essential confidential data, COIB must seek approval from OMB on an ad hoc basis for funding for new servers and related IT equipment to keep our out-of-date hardware functioning and secure. Being forced to rely on outdated software takes up significant City time – at COIB, at OTI, and of filers at City agencies – and limits the capacity of COIB to do its best work in fulfilling its Charter mandates to gather and review annual disclosure reports.

The City of New York has long been a national leader in municipal ethics, with a robust conflicts of interest law that applies to all City public servants and an independent board appointed by the three Citywide elected officials with the advice and consent of the City Council. COIB needs sufficient and secure funding to continue, and expand, its work in ensuring that public service is, and continues to be, a public trust. We welcome questions on these and any other subjects of the Council's concern.