SURVEILLANCE
RESISTANCE LAB

New York City Council Technology Committee
September 30 Hearing re: the MyCity Platform


Testimony presented by:
Cynthia Conti-Cook
Director of Research and Policy
Surveillance Resistance Lab


**Stop, question, and assess
the costs and serious risks
MyCity presents.**

Thank you to Chair Gutiérrez, and members of the committee, for holding this public hearing and for allowing the public the opportunity to address our deep concerns about how this administration intends to use the MyCity portal to facilitate the expansion of police force through New York City agencies.

The Surveillance Resistance Lab investigates how the expansion of corporate technology solutions in government (data collection, AI, chatbots, etc.) can undermine democratic engagement and civic space, as well as cause real harm to communities accessing government services.

We urge the City Council to stop, question, and assess the costs and serious risks associated with MyCity – particularly for low-income, immigrant, and criminalized New Yorkers, communities of color, and anyone receiving public benefits, mental health or substance addiction services through city agencies.

MyCity is a clear example of what happens when cops and corporations occupy central decision making roles and are able to design durable infrastructure through opaque procurement processes without democratic debate or meaningful public engagement.

We cannot allow the administration to continue constructing this highly consequential digital infrastructure, including the associated digital wallet, through procurement processes that they have made even more undemocratic. For example, just last week the administration passed a rule allowing them even less transparency and accountability through the demonstration project process.

MyCity as designed not only allows this administration to expand policing's role in overseeing survival services in the City but will embed police and corporate tech control over these roles well beyond this administration.

While the core of what the government must do is provide services with care, this administration is reconfiguring the entirety of the City to provide services with cops and corporate strategies instead.

## Background

According to the MyCity website, it will be "a one-stop shop for New York City services and benefits" – but we have concerns about whether it is also a "one-stop shop" for city workers and vendors accessing sensitive information about New Yorkers.[1] In addition, during a 2023 Tech Committee hearing on MyCity and digital wallets, the administration

---

[1]Lach, Eric. "Eric Adams Wants to CompStat New York City." The New Yorker, May 22, 2021. https://www.newyorker.com/news/our-local-correspondents/eric-adams-wants-tocompstat-new-york-city.

announced that spending data collected from digital wallets would also be integrated into the MyCity platform.[2] The Commissioner of the Office of Technology and Innovation (OTI), Matt Fraser, testified at that hearing that "[centralizing] benefits on a single digital platform [...] would give government agencies better means to keep track of how government-provided money is being spent." That would include "replac[ing] traditional city government payroll checks and direct deposit with a 'cyber wallet' to pay government workers and public benefit recipients."

This rapid expansion of digital control over our lives without any democratic debate or assessment should be concerning for all New Yorkers. Much of what we have learned about MyCity has been through external investigation, rather than transparent governance. For example, earlier this month, we learned from an internal memo obtained by *The City* that NYPD officials will become embedded throughout civilian agencies as well as the early summer announcement of a training facility for the city's new "public safety apparatus".[3]

With former NYPD Philip Banks leading the attempt to embed NYPD officials throughout city agencies[4] and former NYPD Matthew Fraser leading the development of digital technologies to serve that vision, we testify today about the MyCity portal out of grave concern for how much power it will take from the people who are the heart of this city–New York's communities of color, low-income, and working class, and how much power it will give to New York's police, corporate technology vendors, and elite to continue the structural violence of "[hiding] visible signs of inequality."[5]

While New Yorkers should expect the government to harness technology to benefit our ability to access parks, shelters, benefits, childcare, education, and health care, we should not accept that it comes at the cost of exposing vulnerable New Yorkers to fines, family separation, forcible removal from subways, sidewalks, and parks, detention, deportation and other harmful state uses of force.

The very creation of MyCity at this time, with the amount of power the NYPD is seeking to seize across city agencies, facilitates a foreseeable increase in police violence throughout the City and a corresponding foreseeable increase in the amount of physical, psychological, and emotional damage the City will be responsible for. Joe Puleo, president of District Council 37 Local 983, put it best in reaction to news that an NYPD official would be embedded at the Parks Department: "They weren't primarily there to be like a police force, [but] they were there to give comfort, information,

---

[2]Liu, Nicholas. "How the Adams Administration Is Thinking About Blockchain and Cryptocurrency." Gotham Gazette, March 17, 2023.
https://www.gothamgazette.com/city/11883-city-council-mayor-adams-blockchain-cryptocurrency
[3] Katie Honan, Reuven Blau and Yoav Gonen, "NYPD Expands Role in Civilian Agencies as Feds Circle Top Cops", The City, Sept. 11, 2024.
https://www.thecity.nyc/2024/09/11/nypd-expands-in-civilian-agencies-as-feds-circle/
[4] Katie Honan, Reuven Blau and Yoav Gonen, "NYPD Expands Role in Civilian Agencies as Feds Circle Top Cops", The City, Sept. 11, 2024.
https://www.thecity.nyc/2024/09/11/nypd-expands-in-civilian-agencies-as-feds-circle/
[5] Communities United for Police Reform at 10.

stewardship, to the parks." The article continues to describe his argument, "Now, the NYPD brings a "hardcore" culture of enforcement, including stopping and frisking New Yorkers".[6]

## We must first stop MyCity.

We need to stop MyCity because thus far its purpose and design have been decided behind closed doors by cops and corporate tech. And now also because of critical questions about potential corruption.

It is a clear example of what happens when cops and corporations occupy central decision making roles and are able to design durable infrastructure without democratic debate or meaningful public engagement.

Just last week, this administration moved to make demonstration project procurement even less transparent and accountable to the public–the Comptroller's representative and former Chief Procurement Officer both opposed it.[7]

For decades, the priorities, personnel, and power of the New York Police Department has transformed our city government–it is the only agency that adjudicates its own investigations and discipline[8], it has consumed a growing proportion of the city budget[9],

[6] Katie Honan, Reuven Blau and Yoav Gonen, "NYPD Expands Role in Civilian Agencies as Feds Circle Top Cops", The City, Sept. 11, 2024.
https://www.thecity.nyc/2024/09/11/nypd-expands-in-civilian-agencies-as-feds-circle/

[7] Procurement Policy Board Meeting Archive, https://www.nyc.gov/site/mocs/regulations/ppb.page, Sept 19, 2024 hearing recording at https://www.youtube.com/watch?v=im1R68XpxVc. It is worth noting that despite having provided testimony and public comment in August, 2024, the Lab was not informed that this rule would be voted on on September 19, 2024. While the procedural rules for these meetings require that they "shall be held at a time and location to be noticed for the PPB and the public by the Clerk" the meeting dates are not, for example, available anywhere on the Procurement Policy Board's website.
https://www.nyc.gov/assets/mocs/downloads/Regulations/PPB/PPBAdminProcedures.pdf

[8] James Yates, Report to the Court on Police Misconduct and Discipline, NYPD Monitor, Sept. 19, 2024 https://www.nypdmonitor.org/wp-content/uploads/2024/09/Discipline-Report.pdf, 178-179. "OATH disciplinary hearings are the rule, not the exception for all other City employees, including other uniformed services…The 2001 MOU and the Rules, allowing APU prosecutions and hearings before OATH Administrative Law Judges, were successfully challenged by the PBA. The Appellate Division, First Department, held that OATH was barred from hearing the matters because New York State Unconsolidated Law § 891 provides that removal hearings for police officers must be held by the Commissioner or a "deputy or other employee" of the Department. The Court interpreted the use of the word "other" to require that any deputy appointed by the Police Commissioner to hear disciplinary hearings must also be an employee of the Department."

[9] Communities United for Police Reform, Path to a Safe, Healthy & Just Recovery: Cut NYPD's Budget & Invest in Communities, June 2021, 10.
https://www.changethenypd.org/sites/default/files/cpr_fy22_nypd_budget_report_6-2021_0.pdf "The expanded role of policing in social service strategies has been at the expense of adequately resourcing community-based infrastructure and services that could more effectively intervene in and prevent violence and create healthy and safe communities in the immediate and long-term."

and other city agencies' headcount, pensions, and overtime pale in comparison to bloated police personnel costs.[10]

This is not unique to New York City police alone–across the country, the Department of Homeland Security has supported unprecedented disproportionate investment in increasingly militarized policing strategies and resources– specifically, technology procurement from corporate vendors.

For example, since 2012 New York City agencies have already been using "Worker Connect" technology to exchange information. Worker Connect was built by a corporate vendor NIEM, originally called the Law Enforcement Information Exchange Program[11] and was launched by the Department of Homeland Security and the Department of Justice in 2005.[12] In 2011, the New York Times reported that Worker Connect was promoted as a "shared data model for efforts like preventing Medicare fraud and enforcing child support."[13]

> A typical file would contain a name, date of birth, Social Security number, address, phone number, names of the head of household and other members of the household, income, education level, race, language and type of city benefits or services that are received, like food stamps, housing and Medicaid. It might also include documents like a lease, a pay stub, a driver's license or a birth certificate that have been previously submitted to a city agency.

The Times report also indicated the intention for Worker Connect's future, "if it could work out its privacy issues, the city might expand the database to include other information, like records of domestic violence and public school records, which would include more than one million students at any given time. It could also eventually be used to share data with nonprofit providers."[14]

The Times report ends with an anecdote about how Worker Connect helped the City separate a family:

> The database has also been used to find information that clients were unwilling to provide. About a month ago, Patrice McRae, a child protective specialist with the Administration for Children's Services, was looking for two children who the agency suspected had been neglected. The children's mother claimed the children were with her in Virginia, but their father said they were with a cousin in

---

[10]"A Look Inside the New York City Police Department Budget," Vera Institute, June 2020, 3-5, https://www.vera.org/downloads/publications/a-look-inside-the-new-york-city-police-department-budget.pdf

[11] NIEM - History https://youtu.be/zsPho9EryYA?feature=shared

[12] NIEM - About NIEM https://www.niem.gov/about-niem/history

[13] Anemona Hartocollis. "Concern for Vast Social Services Database on the City's Neediest," New York Times June 16, 2011, https://www.nytimes.com/2011/06/17/nyregion/promise-and-concern-for-vast-social-services-database-on-citys-neediest.html?searchResultPosition=9

[14] Id.

the Bronx, though he could not provide the address. Tapping into the new interface, Ms. McRae used the mother's name and the cousin's approximate age to find a public housing record for the cousin; the children were found, and are now in foster care.[15]

Advocates on behalf of low-income communities warned us then that this was a privacy risk.[16] Former attorney in chief for the Legal Aid Society, Steven Banks, called Worker Connect "[t]he brave new world" and warned that "with all of the agencies now connected, an error made by one in recording information will cascade through every aspect of your life."[17]

Jane Greengold Stevens, director of special litigation for the New York Legal Assistance Group said that "this sounds extremely broad, and I would be concerned about how it's used and what kinds of protections they are putting in."[18]

MyCity is an expansion of DHS's data sharing vision and its antidemocratic strategy of embracing the secrecy of corporate contractors to do it through. And that vision is long overdue for more attention.

While the NYPD's mission creep has been growing for decades with DHS financial and political support, never before has an executive administration of this city so aggressively sought to expand the power of police even farther into all aspects of city government.

We already know how the NYPD plays with the numbers–for years we have fought them on stop and frisk statistics, disciplinary statistics, and we know how they cooked the books under Compstat to portray themselves as playing a predominant role in achieving public safety.

## We must question MyCity.

We need to question the intent of MyCity because this highly consequential digital infrastructure has been built alongside moves to embed NYPD officials throughout city agencies and this could impact New Yorkers far beyond this administration.

We question how law enforcement will collect, share, and use the MyCity portal to digitally stop and frisk New Yorkers that access city services.[19]

While New Yorkers have been largely left in the dark about the administration's efforts, to support this effort, this administration has also gone to Albany to fight for the One City

---

[15] Id.

[16] Id.

[17] Id.

[18] Id.

[19] Cynthia Conti-Cook and Ed Vogel, MyCity, INC, Surveillance Resistance Lab, March 2024. https://surveillanceresistancelab.org/resources/mycity-inc-a-case-against-compstat-urbanism/

Act. These bills were introduced because this administration asked for them, not because any benefits recipients, advocates, or family members of various disability communities asked for the freewheeling data sharing they allow.

This bill would allow data sharing between agencies with little protection for New Yorkers data from police.[20] While the Assembly bill prevents police from using this data to investigate or prosecute people for penal law violations, it does not prevent police from using the data to enforce the other City rules and regulations. We already know the NYPD is seeking expanded control over these other rules and regulations through Banks' effort to embed NYPD officials across city agencies. This bill also doesn't prevent the NYPD from using that data in their foreseeable use of force investigations, defenses in lawsuits, and other disciplinary processes.

The only other protection offered by the bill is for data sharing agreements negotiated by city agencies. However, the existing MyCity Data Sharing Agreement[21] problematically allows OTI to respond directly to legal demands–an arrangement that facilitates one stop shopping for the NYPD and blurs the boundaries intended to protect New Yorkers data under the Identifying Information Law and NYC Privacy Policies and Protocols.[22]

We fear that this administration has not protected the boundaries between police and civilian agencies. Unlike the fights over how many stops, how many abuses, or how many crime reports they refuse to make, these digital violations carry an additional danger–invisibility. It gives the NYPD the power to digitally search without being seen. It opens a lens into our spending habits, family connections, residential history, social networks, faith communities and more–for people reliant on city services to survive, the lens will be wide-open.

**Digital Wallets and MyCity**

The NYPD has also figured out a way to get inside New Yorkers' wallets without needing to get in your pockets through digital wallets–at the last MyCity hearing in 2023, the Office of Technology and Innovation indicated that data from digital wallets will be integrated into the MyCity platform as well. The administration's stated intention at the last hearing was to not only use digital wallets for people receiving benefits, but to replace payroll and direct deposit to public servants as well. The goal, as the administration testified last year, is "to keep track of how government-provided money is being spent."[23]

---

[20] https://www.nysenate.gov/legislation/bills/2023/S9124

[21] "MyCity Data Sharing Agreement - Childcare," March 21, 2023. https://www.nyc.gov/assets/oti/downloads/pdf/about/mycity-data-sharing-agreement.pdf.

[22] NYC.gov, Citywide Privacy Protections https://www.nyc.gov/assets/oti/downloads/pdf/citywide-privacy-protection-policies-protocols.pdf

[23] Liu, Nicholas. "How the Adams Administration Is Thinking About Blockchain and Cryptocurrency." Gotham Gazette, March 17, 2023. https://www.gothamgazette.com/city/11883-city-council-mayor-adams-blockchain-cryptocurrency

We must question where data collected by digital wallets will be stored, which officials and agencies, and agency staff will have access, how its access will be controlled, how the data will be used, and how its use will be supervised. Of course doing so has been difficult because of how they were procured–through a demonstration project procurement process worth $5 million.[24]

In its Privacy Policy, MoCaFi states that the company collects the following information: "1) contact information (e.g., name, address, home and mobile telephone numbers, email address); (2) biographical information such as household data, preferences, and demographic information (e.g., date of birth, gender, marital status); and (3) Internet protocol (or IP) address, MAC address or device ID/UDID."[25]

When you visit the "Online Properties", the company also collects: browser log files, cookies, web beacons, unique identifiers, and third party opt-outs. The policy states: "When you submit contact information, you accept that this information will be shared with our content providers and other professionals, contractors and staff that may be able to assist you."[26]

The company says this about data sharing:

> We use reasonable precautions to keep the information that is disclosed to us secure. We may provide Personal Information and non-personally-identifiable information to our parent, subsidiaries, affiliated companies, and other businesses or persons for the purposes of processing such information on our behalf and promoting the goods and services of our trusted business partners, some or all of which may store some or all of your information on servers outside of the United States. We require that these parties agree to process such information in compliance with our Privacy Policy or in a similar, industry-standard manner, and we use reasonable efforts to limit their use of such information and to use other appropriate confidentiality and security measures. The use of your information by one of our trusted business partners may be subject to that party's own Privacy Policy.[27]

While MoCaFi is already scheduled to earn millions from this contract, how is the City ensuring that MoCaFi doesn't structure the program to force card users onto the company's "online properties" in order to increase data collection from card users?

There is a precedent for this. In 2020, MoCaFi experienced major rollout problems with a debit card in Hawaii including not having the appropriate level of call center staffing in order to enable people to activate their cards.[28] At the time, MoCaFi encouraged card holders to use the company's online properties to activate and use their cards if users

---

[24] See Appendix for Mocafi Demonstration Project Contract Notification.
[25] Mocafi Privacy Policy, Pg. 1, https://www.mocafi.com/privacy/
[26] Id. at 2.
[27] Id. at 3.
[28] https://www.staradvertiser.com/2020/12/24/hawaii-news/vendor-trying-to-rectify-city-card-activation-issues/

were not able to activate the card by phone. If MoCaFi collects these massive datasets of personal information from anyone the company directs to its "online properties", how are we to ensure that these datasets are not made available to NYPD, ICE, other police, and any data brokers who may purchase MoCaFi's data?

There is a history of concerns about MoCaFi's data sales to data brokers who subsequently sell data to ICE.[29] This was enough of a concern that the City of Detroit terminated a program in 2022 over fears that data from Detroit users could end up in the possession of ICE.[30]

The City must stop, question, and assess MoCaFi's distribution of the debit card for asylum seekers and understand how the company might be manipulating this captured community into generating more data assets and revenues for the company.

MoCaFi also holds a contract with the City to build a digital wallet for MyCity. There is very little information regarding this contract and agreement since a "demonstration project" procurement process was used for the $5 million agreement. The Contract Notification is attached in the appendix, but it only provides one sentence about what the work is. Because the demonstration project process was just expanded by the Procurement Policy Board, this three year demonstration project may be extended by another three years without any public notice, competitive bidding or other democratic process.

When the City government decides to outsource its development of digital infrastructure to tech vendors, it has already decided to make that process less transparent and democratic. Unionized public servants with contextualized experience in how the systems they are building work on behalf of their families, neighbors, and communities are needed to protect the long-term integrity of govtech projects.

When the government uses procurement processes and contracts with tech companies who are not invested in the long-term infrastructure of the city instead, the development of these systems are opaque and in the hands of contractors focused on their deliverables and not the big picture.

Compare, for example, the costs and timeline of updating AccessNYC in-house with MyCity's cost and timeline.

**Demonstration Project Procurement Undermines Local Governance**

Simultaneously to the massive amount of outsourcing happening in the MyCity project, this administration has expanded–as of 30 days from the Procurement Policy Board's last meeting on September 19, 2024–agencies ability to use "demonstration project

[29] https://www.bridgedetroit.com/can-ice-access-detroit-id-program-records/
[30]
https://www.mocafi.com/2022/07/22/mocafi-and-the-city-of-detroit-mutually-agree-to-terminate-detroit-id-relationship/

procurement" processes to make it easier for agencies to invite tech vendors to gather data that help them pave a path towards monopolies without any democratic processes, transparency, or competitive bidding.

While the Procurement Policy Board's rules are supposed to, among other things:

- Provide for increased public confidence in New York City's public procurement procedures;
- Safeguard the integrity of the procurement system and protect against corruption, waste, fraud, and abuse;
- Ensure appropriate public access to contracting information;

The recent rule change to demonstration project procurement is the exception that swallowed the rule. Demonstration Projects are designed to give contracting agencies more flexibility in procurement to select and test technologies and other tools over a short period towards finding long-term solutions to durable challenges.[31] While it provides flexibility, the demonstration project process requires less public disclosure which can impede important mechanisms of oversight and accountability.

The recent rule change means that this procurement method may be used more often, for longer periods of time, and with even less public notice and oversight.

This can be used in ways that undermine democratic control of potentially harmful technologies from entering into NYC. We are deeply concerned about how the demonstration project was used by the City to develop the digital wallet for MyCity.

What was the problem the City was trying to solve? For a technology that has the potential to impact a significant number of NYC residents, shouldn't the City have used a different procurement process in order to have more transparency and opportunity for appropriate oversight over the project?

We testified at the Procurement Policy Board hearing on August 29, 2024 against expanding demonstration projects:

> "The proposed rule changes impacting demonstration projects would expand the scope of what agencies can use the demonstration project process for, extend how many years agencies can take to evaluate a demonstration project, allow agencies to engage a demonstration process without any intention to hold a competitive bid process, and add language encouraging agencies to use challenge-based procurement for demonstration projects."[32]

---

[31] New York City Procurement Policy Board, Rules, Demonstration Project, pgs 102-104: https://www.nyc.gov/assets/mocs/downloads/Regulations/PPB/PPBRules.pdf

[32] Cynthia Conti-Cook, Testimony, Procurement Policy Board, Aug. 2024, https://surveillanceresistancelab.org/wp-content/uploads/Lab-Testimony-Challenge-Based-Reform-Aug-2024.pdf

In that testimony, we shared "several detailed concerns for how the proposal impacts the public's ability to participate and shape how government programs are designed and delivered. Our specific concerns about the expansion of the demonstration project process detailed below include (1) opacity and undemocratic decision-making, (2) data extraction, (3) data security and privacy, (4) corporate dependency, and (5) protecting unionized workers' jobs."

The Board nevertheless voted to support the Mayor's proposal, 3-2, with the Comptroller and former Chief of Procurement officer opposed.[33] In addition to demonstration project procurement processes, we are also concerned about the opacity and anti-democratic nature of Master Service Agreements with tech contractors. We wrote about these concerns in our March 2024 report "MyCity, INC.: A Case Against Compstat Urbanism".[34]

As the title suggests, in that report we also wrote about more general concerns with how the NYPD used Compstat to manipulate the public into believing that it was an authority on crime statistics, and that by refusing to take serious crime reports while pushing patrol officers to abusively stop, frisk, and ticket people disproportionately in low-income Black, Latino, and other communities of color.

**To connect all the dots–the City Council must question what role corporate digital infrastructure like MyCity and digital wallets, procured through opaque procurement methods, plays in the "public safety apparatus" the NYPD intends to control throughout city government and whether its costs are included in the $225 million dollar price tag.[35]**

We know the costs of constructing a cop city–but what are the costs of constructing a digital cop city?

## We must assess MyCity.

The New York City Council must demand answers to these questions and commitments from the administration to protect New Yorkers' mental health, substance use, and other sensitive data collected by city agencies from police access. If we want to use digital tools to enhance benefits access for New Yorkers, how can we do that while still protecting their identifying information from police and data brokers?

We cannot set ourselves up for being in this hall five years from now demanding transparency reports on how often NYPD are unlawfully accessing data about us

---

[33] New York City Procurement Policy Board, September 19, 2024 Meeting: https://www.youtube.com/watch?v=im1R68XpxVc

[34] https://surveillanceresistancelab.org/resources/mycity-inc-a-case-against-compstat-urbanism/

[35] NYC.gov, Mayor Adams Hosts First Ever New York Public Safety Promotion Ceremony https://www.nyc.gov/office-of-the-mayor/news/431-24/mayor-adams-hosts-first-ever-new-york-city-public-safety-promotion-ceremony-new-unified

through the Worker Connect and MyCity portal. We know from decades of experience how secretive police are about their power and how often they abuse it.

Other jurisdictions have already experimented with consolidating city databases and procuring corporate tools to replace public servants with automated decision making.[36] These should be considered cautionary tales for New Yorkers. In addition to protecting New Yorkers' information from police access, we share concerns related to whether the administration intends to add problematic and demonstrably biased automated and predictive tools, against which several cautionary tales from other jurisdictions already warn, to determine benefits eligibility or amount allocation, to detect fraud, or verify identity.[37] The New York City Council must assess the foreseeability of disasters that stem from automating or predicting benefits programs and other city services.

The administration's decision to outsource MyCity's construction to private tech vendors[38], its increasing costs, delays in deployment[39], and the disconcerting rollout of the MyCity chatbot[40] have already roiled its previous enthusiasts.[41] Its expansion of the demonstration project procurement process–despite opposition from the Comptroller and the former Chief of Procurement under the DeBlasio administration–also signals a dangerous undemocratic pattern emerging from this administration.

---

[36] Virginia Eubanks, Automating Inequality–How High-Tech Tools Profile, Police, and Punish the Poor, Picador Press, 2019, 135-137.

[37] "MiDAS: A Cautionary Tale – HECAT." June 22, 2020.
https://hecat.eu/2020/06/22/midas-a-cautionary-tale/; Felton, Ryan. "Criminalizing the Unemployed." Detroit Metro Times, July 1, 2015.
https://www.metrotimes.com/news/criminalizing-the-unemployed-2353533. Charette, Robert. "Michigan's MiDAS Unemployment System: Algorithm Alchemy Created Lead, Not Gold - IEEE Spectrum," January 24, 2018.
https://spectrum.ieee.org/michigans-midas-unemployment-system-algorithm-alchemy-that-created-lead-not-gold. Benefits Tech Advocacy Hub. "Arkansas Medicaid Home and Community Based Services Hours Cuts."
https://btah.org/case-study/arkansas-medicaid-home-and-community-based-services-hours-cuts.html. Brown, Lydia, Michelle Richardson, Ridhi Shetty, Andrew Crawford, and Timothy Hoagland. "Challenging the Use of Algorithmic-Driven Decision-Making in Benefits Determinations Affecting People with Disabilities." Center for Democracy & Technology, October 2020.
https://cdt.org/insights/report-challenging-the-use-of-algorithm-driven-decision-making-in-benefits-determinations-affecting-people-with-disabilities/ Benefits Tech Advocacy Hub. "Arkansas Medicaid Home and Community Based Services Hours Cuts."
https://www.btah.org/case-study/arkansas-medicaid-home-and-community-based-services-hours-cuts.html.

[38] Khurshid, Samar. "Civic Tech Experts Question Mayor Adams' Decision to Contract Out Signature 'MyCity' Portal." Gotham Gazette, May 17, 2023.
https://www.gothamgazette.com/city/11961-mayor-adams-mycity-contracts-services.

[39] Khurshid, Samar. "Mayor Adams Yet to Launch 'MyCity' Portal Promised in First State of the City Speech." Gotham Gazette, January 25, 2023.
https://www.gothamgazette.com/city/11797-mayor-adams-launch-mycity-portal-services.

[40] Colin Lecher, NYC's AI Chatbot Tells Businesses to Break the Law, The MarkUp, March 29, 2024.
https://themarkup.org/news/2024/03/29/nycs-ai-chatbot-tells-businesses-to-break-the-law

[41] Khurshid, Samar. "Civic Tech Experts Question Mayor Adams' Decision to Contract Out Signature 'MyCity' Portal." Gotham Gazette, May 17, 2023.
https://www.gothamgazette.com/city/11961-mayor-adams-mycity-contracts-services.

Allowing millions of taxpayer dollars to continue flowing to tech vendors constructing the MyCity system not only recalls past tech procurement scandals like City Time, expansion of the demonstration project procurement invites long-term corporate lock-in strategies to target the city for generations.

In addition, we believe protecting unionized city govtech positions play a critical role in defending democracy and that expanding Compstat metrics to measure other city agency services invites political abuse, as it did in the NYPD under Compstat. We recall that when police officers felt the pressure of commanding officers under Compstat, that the message they received was to manage the numbers, not the problem. They refused to take New Yorkers crime reports if they made the precinct's numbers look bad. They encouraged violent and traumatizing tactics like stop and frisk, issuing summons, and escalating encounters violently in order to paint the right kind of metric picture.

## Conclusion

We cannot let this toxic management style continue to infiltrate our city government. We cannot let that culture of secrecy and power through domination rather than trust infect all of the city government more than it already has.

We share these grave concerns for how much power MyCity technology will take from the people who are the heart of this city–and how much power it will give to New York's police, corporate technology vendors, and elite to continue the structural violence of failing to respond to root causes and continually increasing policing rather than care.

## Appendix

- Cynthia Conti-Cook and Ed Vogel, MyCity, INC, Surveillance Resistance Lab, March 2024. https://surveillanceresistancelab.org/resources/mycity-inc-a-case-against-compstat-urbanism/
- "MyCity Data Sharing Agreement - Childcare," March 21, 2023. https://www.nyc.gov/assets/oti/downloads/pdf/about/mycity-data-sharing-agreement.pdf.
- Testimony opposing expansion of demonstration project procurement, August 2024 https://surveillanceresistancelab.org/wp-content/uploads/Lab-Testimony-Challenge-Based-Reform-Aug-2024.pdf
- Mocafi Demonstration Project Procurement Contract Notification https://drive.google.com/file/d/1Mjox994RsoqmA68oWQrmDXEXbaLwm1zw/view
- Mocafi Privacy Policy https://www.mocafi.com/privacy/