



Pete Grannis
Deputy Comptroller
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Dear Deputy Comptroller Grannis and Colleagues,

Thank you very much for meeting with the NYC Transparency Working Group and our colleagues on November 15th to preview improvements to Open Book New York and discuss the Comptroller's open government initiatives more broadly. Our groups strongly support your efforts to upgrade Open Book New York, and we commend your efforts to make State Financial System data more useful to the public. As promised, here are our recommendations in writing, with those focused on general open government first, and those specific to Open Book New York second.

Maximize the Transparency Power of the Comptroller's Office

1. Issue an Open Government Plan from Comptroller DiNapoli which makes it clear to the public, other branches of government, and your staff what your comprehensive goals, intentions, and implementation schedule are regarding open government initiatives. This plan should be updated annually and include next steps and aspirational goals which make it clear to the public what you are doing, and what you think should be done in the future. President Obama's Open Government Initiative has been hugely influential in spreading basic concepts of online transparency to all levels of government. Similarly, your open government plan can set a new national standard for what state and local comptrollers can do to increase transparency.

2. Open Up PARIS and Other Authorities Data. The Public Authorities Reporting Information System (PARIS) annual report and budget data, as well as any other authorities data collected by the Comptroller, should be available in an online database downloadable in a CSV/Excel format and accessible via Application Programming Interface (API). This data is currently online at the ABO site in non-machine readable PDF files, which makes it hard for the public to use, and greatly reduces its usefulness. This is a very discrete task that is well suited to outsourcing, and could be national model for how fiscal reporting data should be displayed.

3. Increase the Transparency/Usability of Office of the State Comptroller (OSC) Data. Broadly, OSC should work to get as much data released in a machine-readable database format as possible. OSC currently releases much of its data as tables embedded in ad hoc reports in a non-machine readable PDF format. We recommend that OSC use an open data platform like DKAN-CKAN or Socrata to organize data sets now scattered around the OSC site, and to post those public data sets and reports online in an easily searchable, usable format, available via API.

4. Increase Pension Management Transparency. Our groups are not experts in this area, but we have spoken with reporters and the staff from fiscal watchdog groups who are, some of whom believe OSC should increase the transparency of its sole trustee pension management system. We recommended that your office convene an expert stakeholder group, including journalists who cover the pension beat such as from *Bloomberg News*, *Bond Buyer*, and the *Wall St. Journal* and watchdog groups like CBC, Fiscal Policy Institute, and the Empire Center. Ask them for specific recommendations and begin a process of continuous improvement towards higher transparency. Make this process public in the Open Government Plan.

5. Get Full Value From FOIL Responses: Create a “Reading Room” in which all responses to non-personal FOIL requests are published. Include downloadable spreadsheets in open data format (CSV, Excel) for tabular data. (Show responses only, we recommend redacting identity of request filer.) For example:

- Port Authority: <http://bit.ly/1be8oCa>
- FBI: <http://vault.fbi.gov/reading-room-index>
- EPA: <http://www.epa.gov/foia/frequent.html>

We appreciate the Frequently Requested Publications page (at <http://osc.state.ny.us/reports>), which may or may not be the result of FOIL requests, but these reports are published in a PDF format, locking away any useful data in a non-reusable format.

6. Move Grant and Contract Filing Completely Online. (i.e. implement a paperless grant gateway.) The New York State Department of Taxation and Finance mandates that New Yorkers file their taxes online. The NYC Campaign Finance Board mandates that candidates use its online system, C-SMART, for recording campaign contributions. Representatives from those agencies and many others say that online filing is one of the most powerful and important transparency steps that a government entity can take. It vastly reduces the cost of data retrieval and greatly increases the speed and completeness with which data can be displayed. We would expect significant cost savings from moving to a paperless system and fewer errors and delays.

Specific to Open Book New York

1. Publish High Dollar Value Contracts with State Vendors in the Next Six Months by picking a manageable subset of contracts which are worth over a certain amount and publishing them through Open Book New York. It is important to establish the precedent that contracts are in the public domain; as time progresses, seek to publish a larger and larger share of all contracts.

2. Require Contractors Report Payments to Subcontractors Online, as NYC is doing. We understand that there are obstacles in terms of gathering this information, but nonetheless urge your office to explore how it can get state vendors to reveal payments to subcontractors. The OSC and/or the Executive can include provisions in contracts requiring contractors to report all payments to subcontractors. We note that the widespread use of “conduit” or GSA Schedule prime vendors makes it difficult to know what firm is actually doing the work for state agencies. Beginning in March 2013, the NYC Mayor’s Office of Contracts (MOCS) and NYC Comptroller began requiring NYC vendors with contracts worth more than \$250k report all payments to subcontractors. These payments will be displayed on CheckbookNYC.com beginning in April 2014.

3. Identify the Contract Award Process as Competitive or Noncompetitive. This could be accomplished by including a data field adjacent to “Type of Contract” in the Open Book “Contract Search Results Page” per: Competitive, Non-Competitive, N/A or backdrop. (Some types of contracts can be bid or no bid, so knowing the type of contract does not always reveal award process.)

4. Publish a Range, or Maximum, for Backdrop Contracts. It is misleading to use zero as a placeholder. Backdrop contracts vary widely in size, and some are in the tens of millions of dollars range. For example: <http://bit.ly/1jmGmIh>

5. Identify the State Fund From Which Expenditures are Paid. With this information, Open Book NY could help illuminate payments from lump-sum funds allocated via MOU or other agreements which are not readily available to the public.

6. Improve Contract Descriptions. Most contracts described in Open Book are too vague to be informative to the public, and are not descriptive enough to help sort data while searching. Descriptions are a fundamental part of the metadata needed to make the entries in Open Book's contract database useful for analysis and research.

7. Open Procurement Request Forms and Make Them Freely Available; it is not apparent why access to these should be restricted to those who have signed up. See: <http://www.osc.state.ny.us/procurement/rfps.htm>

Thank you again for your interest. We look forward to following up on the progress of Open Book New York and Comptroller DiNapoli's transparency initiatives.

Sincerely,

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