



THE CITY OF NEW YORK  
**OFFICE OF THE COMPTROLLER**  
SCOTT M. STRINGER

May 26, 2020

Dr. Oxiris Barbot  
Commissioner  
New York City Department of Health and Mental Hygiene  
42-09 28th Street  
Long Island City, NY 11101

Dear Commissioner Barbot:

As I know you agree, it is imperative that our City's pandemic response be driven by data and the best available science on the disease. Recent advances in the availability and accuracy of antibody testing promise to help us better understand the scope of the current crisis and to develop more precise strategies to combat the spread of the virus. With the aim of increasing transparency and better informing strategies for a safe re-opening, I am calling on the New York City Department of Health and Mental Hygiene to aggregate and make public results of all COVID-19 antibody tests.

Antibody testing is being offered widely by health care providers in New York City to identify individuals who have been exposed to SARS-CoV-2, and may have acquired some degree of immunity. On May 2nd, the Governor announced that in a sample of antibody test results as many as 19.9 percent of City residents were found to have been exposed to the virus and earlier this week the Governor offered further information relating to 8,000 antibody tests done at NYC churches in lower-income New York City communities and communities of color. According to the Governor, the rate of positive tests in the Bronx alone was 34 percent, compared to a citywide average of 19 percent. These disparities are alarming and further demonstrate how the virus has preyed disproportionately on the vulnerable and communities of color.

Antibody testing information offers a crucial datapoint that must be a foundation of our public health response to this virus. Communicable disease reporting is required by both the New York State Sanitary Code and the New York City Health Code, due to the compelling public interest in allowing government to act on relevant health data. New York State clarified that antibody test reporting is also required in guidance issued on April 30, and the New York State Department of Health confirms it is providing this data to the City. However, the City has not disclosed any data or offered any information how the City makes use of the data provided. The City must disclose aggregate antibody testing data from all New York City health care providers so that we do not lose the opportunity to learn everything we can about this virus. Disclosure of aggregate antibody testing would:

**Improve our understanding of rates of infection by age, neighborhood, sex, race, ethnicity, health status, immigration status, and employment.** We have seen firsthand how this disease disproportionately impacts immigrants, seniors, those living in overcrowded households, and those in neighborhoods with poor air quality. This data would be critical to unpacking varied health outcomes and developing strategies to meet those specific challenges.

**Dispel fear and improve understanding of the new pediatric multisystem inflammatory syndrome manifesting itself among NYC children by measuring coronavirus exposure among children.** Parents across our City are confused and scared for their children. While I know the City is releasing what information it has about this disease, I firmly believe that more information is the best way to combat fears and that greater data transparency would help to assuage concerns. Establishing a baseline estimate of infection rates among children and comparing that with the known incidents of this syndrome will allow us to better understand its scope.

**Enable comparisons of different antibody tests being offered by different providers.** New Yorkers are already lining up for antibody tests at healthcare providers around the City, but these tests have been brought to market very quickly, and some are likely more accurate than others. Disclosing data from across different antibody test makers could potentially allow us to see if different tests done on similar populations show similar results, which would be reassuring, or different results, which could help identify problems.

**Provide greater information to ensure a more effective response to the pandemic and to inform a safe, strategic reopening.** As we work together to safely reopen our city and economy, better information about exposure will be critical to the many decisions ahead.

DOHMH should work immediately to release aggregate antibody test data as soon as possible. If there are any roadblocks to disclosing this data, DOHMH should work to clear them. As we move forward, regular reporting of antibody test results will provide data to improve decision making and help protect more New Yorkers from this virus.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Stringer", written in a cursive style.

Scott M. Stringer  
New York City Comptroller