



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

May 8, 2020

Mayor Bill de Blasio
City Hall
New York, NY 10007

Re: Transfer of Disease Contact Tracing

Dear Mayor de Blasio:

I am writing to express my deep concern about your decision to transfer critical public health responsibilities from the City's Department of Health and Mental Hygiene (DOHMH) to the City's Health and Hospitals (H+H) system. Tasking H+H with leading the City's "Test and Trace Corps" is both contrary to historical precedent and to the established expertise already housed within DOHMH. Contact tracing is a crucial component of the City's recovery strategy and I fear that instead of being led by DOHMH, a recognized national leader in public health for which contact tracing has been a core function for over a century, you have tasked H+H with initiating an entirely new program that goes beyond its core mission of providing medical care. At a time when H+H should be focused on providing medical care, especially if infections spike in coming months, operating a new program could further strain their administrative and managerial capacity.

I agree that the expeditious formation of a "Test and Trace Corps," a contingent of 2,500 public health workers charged with tracing the contacts of every person who tests positive for the coronavirus is essential to our City's recovery. However, for contact tracing to be effective it must be executed comprehensively and with expertise, qualities that DOHMH have demonstrated in its past contact tracing initiatives. The transfer of DOHMH staff to H+H to supervise the program only emphasizes the competency of DOHMH in undertaking this work.

Moreover, that rationale for the transfer of functions to H+H to enable quicker hiring of contact tracers and procurement of testing and other needed services appears entirely unjustified in light of the City's COVID-19 emergency orders that enable the City to bypass statutory controls and enter into emergency contracts quickly without the normal reviews.

The decision to transfer what have long been key functions of DOHMH, especially in the midst of a pandemic that has claimed nearly 20,000 lives of New York City residents,¹ and the apparent justification for them raises questions that must be answered.

Accordingly, as the chief fiscal officer for the City, I request that the Administration respond with an explanation of:

1. The reason and rationale for the transfer of:
 - a. The contact tracing function from DOHMH to H+H;
 - b. The virus testing function from DOHMH to H+H;
2. Hiring procedures and regulations at H+H that would allow it to more quickly onboard new hires.
 - a. Is H+H able to hire contact tracing personnel more quickly and efficiently than the Fund for Public Health, which has been performing the hiring function on behalf of DOHMH? If yes, please explain why.
 - b. Will the Fund for Public Health continue to have a role in hiring if the contact tracing function is transferred to H+H according to your plan? If yes, please explain why.
3. Procurement procedures and regulations at H+H that would allow it to procure necessary equipment and supplies more expeditiously than DOHMH could do under the current suspension of City Charter Chapter 13, per the Mayor's Emergency Executive Order #100.

I question whether effecting such a significant change to established health care practices is wise in the middle of a deadly pandemic. Answers to the above questions might justify such a change, and provide confidence to the City that elected officials are taking the necessary actions to ensure public health.

Please respond to this request for information by Friday, May 15. If you have any questions, please contact Marjorie Landa at 212-669-8459.

Sincerely,



Scott M. Stringer
New York City Comptroller

CC: Dean Fuleihan, First Deputy Mayor
Dr. Oxiris Barbot, Commissioner, New York City Department of Health and Mental Hygiene
Dr. Mitchell Katz, President and Chief Executive Officer of NYC Health + Hospitals

¹ DOHMH statistics report 14,162 confirmed deaths and 5,378 probably deaths. See <https://www1.nyc.gov/site/doh/covid/covid-19-data.page>.