



# NEW YORK CITY COMPTROLLER **BRAD LANDER**

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## **Audit Report on the New York City Office of Technology and Innovation's MyCity System**

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THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BRAD LANDER

December 30, 2025

To the Residents of the City of New York:

My office has audited the New York City Office of Technology & Innovation (OTI) to determine whether its MyCity application streamlines the delivery of services and benefits and allows the City to track agency performance in real time.

The audit found that OTI created a Common Services platform and digitized an existing childcare application. However, OTI has not fulfilled its primary goal of creating a one-stop shop, and users are still not able to apply for all City benefits and services through a single form, receive benefits and services via a digital wallet, or benefit from a streamlined applications process for low-income New Yorkers and City employees.

While MyCity provides access to information about benefits, business, and jobs services, it largely redirects users to pre-existing City websites that have been rebranded and redesigned as MyCity applications. In addition, the Artificial Intelligence (AI) Chatbot that was developed appears to be unable to provide accurate or consistent information. MyCity still cannot track City agency performance, and low website performance scores for the portal may impact user experiences.

The audit made seven recommendations and OTI disagreed with all the recommendations.

The results of the audit have been discussed with OTI officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please email my Audit Bureau at [audit@comptroller.nyc.gov](mailto:audit@comptroller.nyc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "B. Lander", written over a horizontal line.

Brad Lander  
New York City Comptroller

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# Audit Impact

## Summary of Findings

The New York City Office of Technology and Innovation (OTI) developed the MyCity application to serve as a “one-stop shop” for users to apply for and receive City benefits and services. Although OTI created a Common Services platform and digitized an existing childcare application, the agency has very little else to show after spending more than four years and \$100 million on the program. Users still cannot apply for City benefits and services through a single form or receive benefits and services via digital wallet. The applications process for low-income New Yorkers and City employees is not streamlined, as promised.

While MyCity provides access to information about benefits, business, and jobs services, it largely redirects users to pre-existing City websites that have been rebranded and redesigned as MyCity applications. In addition, the Childcare portal has limited and ineffective functionality, and the Artificial Intelligence (AI) Chatbot that was developed appears to be unable to provide accurate or consistent information. MyCity still cannot track City agency performance, and low website performance scores for the portal may impact user experiences.

Overall, based on the evidence provided by OTI, the audit concludes that MyCity was poorly managed from both a project management and contract oversight perspective. In addition to the \$100 million spent so far, OTI has requested a further allocation of \$81 million in the 2026 budget to maintain what has been created and to add additional functionalities.

## Intended Benefits

The audit’s recommendations are intended to help OTI enhance MyCity workflows, strengthen project management and contract oversight, improve the delivery of services and benefits, and streamline access to City programs.

# Introduction

## Background

In January 2022, Mayor Adams signed Executive Order 3, a directive that consolidated the City's various technology operations under a single agency: the New York City Office of Technology and Innovation (OTI). OTI was granted oversight of all Citywide information technology, information security, information privacy, and telecommunications matters, as well as the authority to develop and implement related projects.<sup>1</sup> That same month, the Mayor announced that the City, under OTI, was creating the MyCity portal, an online platform intended to serve as a “one-stop shop” for all City services and benefits, so that New Yorkers would not be required to visit different agency websites or offices to access and apply for services.

The portal was intended to help low-income New Yorkers access services for which they qualify but do not receive due to the complicated and time-consuming nature of applications processes. Although programs require much of the same information and documentation to support eligibility, applicants must complete multiple applications and, in some cases, appear for in-person interviews during the workweek, which may cause them to miss work and lose pay.

MyCity was intended to streamline this process by creating a universal application and verification process, so New Yorkers could qualify for multiple benefits at the same time. MyCity was expected to let users share their data with other City agencies, allowing them to receive proactive benefit recommendations and access benefits for which they might be eligible via a digital wallet. The portal was also intended to reduce the workload on City employees responsible for processing applications.

## Childcare Portal

In March 2023, OTI launched phase one of the MyCity portal, which digitized the application for childcare assistance offered by the Administration for Children's Services (ACS) and the Department of Education (DOE), allowing users to upload supporting documentation. Users were able to create a single MyCity account where they could apply for services in more than 10 languages and save their information and documentation for future applications.

Before the MyCity portal, residents applied for childcare assistance and submitted all required documentation through a manual paper process to ACS or DOE, depending on the type of

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<sup>1</sup> OTI, formerly known as the Department of Information Technology and Telecommunication (DoITT), in conjunction with NYC Cyber Command, established policies and standards regarding the security, implementation, and maintenance of the City's information infrastructure.



childcare requested. Now, residents can self-screen for eligibility, apply for childcare vouchers and contracted care, and track application status online. In March 2024, OTI expanded childcare service functionality to allow families receiving benefits to submit their annual recertifications through MyCity.

In the *Fiscal 2025 Mayor's Management Report*, OTI reported that as of June 2025, more than 120,000 applications and recertifications for childcare were submitted through the MyCity childcare portal since its launch in spring 2023.

## Business Portal

Since its initial launch, OTI has added a business services portal to help users identify licenses, permits, and other requirements to operate a business, as well as an AI Chatbot to answer questions and provide information about owning and operating a business in the City. Later in March 2025, the Chatbot capabilities were expanded to include information on City government services.

## Jobs Portal

In addition, OTI added a Jobs NYC portal to help people prepare for and enter the workforce by providing users with links to resources identifying available training programs, education, and job opportunities. The Jobs NYC portal also provides employers with links to resources for hiring employees or interns, and apprenticeship programs.

## Benefits Portal

This portal redirects users to ACCESS NYC, a website maintained by the Mayor's Office for Economic Opportunity that compiles information about benefit programs. The portal allows residents to check potential eligibility for local, state, and federal benefit programs, and offers information and guidance on how to apply for services, such as family support, food assistance, healthcare, and housing.

## Organizational Structure

MyCity is overseen by three major divisions of OTI that work with vendors and stakeholders to plan, design, test, and implement the project. These three divisions are:

- **Application Development Services**, which is responsible for designing, building, and supporting enterprise-level products and services for the public and City agencies.



- **The Office of Data Analytics**, which develops data standards and governance to support Citywide data integration and enhances Citywide infrastructure and sharing.
- **Design Services**, which applies human-centered design and user research to shape the MyCity interface and notifications, guiding applicants through the enrollment process.

In addition, OTI contracted with vendors to design, develop, and oversee MyCity. Specifically, OTI contracted with Innovative Business Concepts Inc. (IBC) to assess current state and develop short and long-term plans for MyCity portal development, including a project plan, detailed functional requirements, and a roadmap, among other things.

OTI also contracted with Rangam Consultants Inc. to provide technical project management oversight.

OTI also entered into a Data Sharing Agreement (dated March 21, 2023) with various City agencies to streamline services that they administer. These agencies include ACS, DOE, the Department of Homeless Services (DHS), and the Human Resources Administration (HRA).

## System Development Costs

MyCity was initially intended to be developed in-house, using OTI staff. However, OTI stated that due to a lack of staff resources, the office contracted with outside vendors for project planning, design, development, quality assurance testing, and system implementation and maintenance. OTI contracted with approximately 50 different vendors to perform various aspects of these services.

As of October 2025, OTI has spent more than \$100 million through more than 120 agreements (including contracts, purchase orders, and delivery orders). According to OTI's January 2026 budget plan, the office plans to spend an additional \$74.3 million for capital needs related to the maintenance of existing services and future design. The plan also called for \$6.6 million for Other than Personal Services (OTPS) expenses, including 24 new full-time staff to replace 16 consultant positions.

## Objective

The objective of this audit was to determine whether MyCity streamlines the delivery of services and benefits and allows the City to track agency performance in real time.

## Discussion of Audit Results with OTI

The matters covered in this report were discussed with OTI officials during and at the conclusion of this audit. An Exit Conference Summary was sent to OTI on November 21, 2025, and discussed

with OTI officials at an Exit Conference held on December 1, 2025. On December 8, 2025, we submitted a Draft Report to OTI with a request for written comments. We received a written response from OTI on December 19, 2025. In its response, OTI disagreed with all seven recommendations and findings related to project management and contract oversight.

OTI stated that the report simplifies the concept of the “one-stop shop” and misstates the intent and functionality of the MyCity platform. OTI further stated that MyCity was never intended to replace individual agency website functionality. However, when MyCity was launched in March 2023, Mayor Adams stated in the introductory video on the portal that MyCity is a “one-stop shop” where New Yorkers can easily search and apply for City services and benefits, track application status, and securely store personal information all in one place.

In addition, OTI raised several arguments that were also raised at and following the Exit Conference and that were already addressed in the Draft Report, including assertions that the report wrongly assumes that the agency must use the waterfall system development model. OTI stated that MyCity was implemented using an agile methodology and the agency never intended for IBC to provide a final project plan, roadmap, timeline, or cost benchmarks for MyCity.

As detailed in this report, the OTI contract with IBC for MyCity portal design and development services states that IBC could use a hybrid system development methodology, employing both waterfall and agile methodologies. The purpose of this was to “retain the clarity and tracking system of the waterfall method” and to provide the flexibility of the agile method. Furthermore, although IBC contracts included deliverables for assessing the existing state, defining key functional requirements, creating milestone-based project plans with deadlines, and cost estimates, OTI failed to produce evidence that IBC delivered them.

OTI’s written response has been fully considered and, where relevant, changes and comments have been added to the report. The full text of OTI’s response is included as an addendum to this report.

# Detailed Findings

Although OTI has created a Common Services platform and digitized an existing childcare application which allows users to perform related transactions online, OTI has very little else to show after the passage of four years and City expenditures that exceed \$100 million.

OTI has not fulfilled its primary goal of creating a one-stop shop and users are still not able to apply for all City benefits and services through a single form, receive benefits and services via a digital wallet, or benefit from a streamlined applications process for low-income New Yorkers and City employees, as promised. MyCity is still not able to track City agency performance, as also promised, and “new” portals that have been established under the program add few new features or functionality.

The “new” Benefits portal within MyCity simply redirects users to the ACCESS NYC website, and the “new” Business Services and Jobs portals mainly consist of pre-existing websites that have been rebranded and redesigned as “MyCity applications.” Although OTI has also established an AI Chatbot, it appears to be unable to consistently provide accurate information to users. The Childcare portal—the most developed so far—has limited and ineffective functionality. In addition, low website performance scores for the portal may impact user experiences.

Overall, based on the evidence provided by OTI, the audit concludes that MyCity was poorly managed from both a project management and contract oversight perspective, and that it ultimately represents a poor return on investment. In addition to the \$100 million spent so far, OTI has requested a further allocation of \$81 million in the 2026 budget to maintain what has been created to date and to add additional (unspecified) functionalities.

## OTI Lacked a Clear Vision and Detailed System Development Plan for MyCity

OTI contracted with Innovative Business Concepts, Inc. (IBC) to develop short- and long-term plans for MyCity portal development, including those related to the Business and Childcare workstreams. Each of the four contracts stated that IBC was responsible for producing deliverables, and OTI Project Managers were responsible for reviewing and accepting them.

According to the contract terms and conditions, IBC’s deliverables included identifying and defining MyCity workstreams and creating a project plan, defining key functional requirements and implementation timelines by workstream, and the provision of an overarching roadmap. The project plan provided by IBC was also to include cost estimates to ensure that the desired implementation scope was attainable within budget.

Despite OTI paying \$2.5 million to IBC under the contracts, and despite repeated requests to OTI over many months, OTI has failed to produce any evidence that IBC delivered to the City a roadmap document, detailed project plans, or associated cost estimates. OTI has failed to produce a comprehensive system development plan for MyCity or any other documentation showing the “current state” as of the project start, or the anticipated “future state” upon project completion. OTI has also failed to produce time or project benchmarks that were to be met by IBC prior to payment being rendered or any documentation to show that OTI held IBC accountable for these.

All that OTI has produced to date is high-level documentation that does not constitute detailed project plans, a roadmap, project timeline or cost benchmarks. In the absence of this documentation, this audit concludes that OTI lacked a clear vision for the development of MyCity, lacked detailed project plans, and did not hold IBC accountable for deliverables it was intended to provide.

While MyCity provides access to information about benefits, business, and jobs services, OTI largely rebranded or redirected users to pre-existing City websites. Prior to MyCity, the City already had websites (such as NYC311) that compiled information about benefits and support, childcare, starting and operating businesses, and jobs, among other things, and directed users to City agency websites. Under MyCity, users must still complete multiple applications for benefits and services and apply for them through administering agency websites. This does not meaningfully streamline the application process.

These issues are discussed by workstream in greater detail below.

At the exit conference, OTI officials stated that the intent of the IBC contracts was for IBC to provide a “scan” of the current state and a high-level roadmap and was not expected to produce detailed system requirements. OTI officials simultaneously stated that the agency came up with its own final requirements, that MyCity was developed using an agile approach, and that the process is ongoing. They further stated that it is not good practice to be locked into a pre-destined path.

However, OTI’s assertions are contrary to the scope of services detailed in the IBC contract for design and development services for the MyCity portal. This contract state that IBC could use a hybrid methodology that would “retain the clarity and tracking system of the waterfall method” and provide the adaptability and flexibility of the agile method.<sup>2</sup> According to the National Institute for Standards and Technology (NIST), when the waterfall model is used, the requirements are usually well-defined so planning can be done up front. As also stated in NIST, this “model works well with

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<sup>2</sup> The waterfall model is a linear, sequential System Development Life Cycle (SDLC) methodology that includes phases for requirements for gathering, design, implementation, testing, deployment, and maintenance. Agile projects define requirements both before and during execution and provide frequent and iterative deliveries of incremental products.

complex projects where the requirements are well understood because the complexity can be dealt with in a structured way.”

According to the contracts, IBC was responsible for analyzing the as-is conditions (current state) of City service platforms to ensure a thorough understanding of existing service landscape, establishing the MyCity project workstreams and a draft of the future state architecture, and creating a milestone-based project plan for each workstream outlining key deliverables and deadlines as well as an overarching roadmap stitching together the various individual workstream timelines, among other things. Additionally, the contracts stated that IBC would present the proposed portal design and roadmap to the OTI Chief Technology Officer and executive sponsors for final approval. Although OTI paid IBC for MyCity portal design and development services in October 2022, OTI failed to produce any evidence that IBC delivered a roadmap document, detailed project plans, or associated cost estimates.

After the exit conference, OTI provided a limited number of work-in-process, quarterly roadmaps. However, these roadmaps were not prepared during the MyCity design and development phase in 2022. Rather, these roadmaps provide a high-level vision for the “Overall MyCity Solution” and a recap and updates to the MyCity Roadmap for the first, third, and fourth quarters of Calendar Year 2025.

## **MyCity Does Not Meaningfully Streamline the Process to Apply for City Benefits and Services**

### **Common Services**

MyCity’s Common Services includes systems integration technology that allows MyCity to save and unify user profile information, which allows the storage of personal information documents, tracking of application status, and receipt of notifications. Users can create account profiles and save their personal information (such as name, date of birth, address, and Social Security number) or business information (such as business name, Employer Identification Number, or Social Security number), and upload documentation required for childcare program eligibility determinations. Users who create business profiles can also search for and save business transactions with other City agencies to a dashboard including licenses or permits, violations, or payments.

However, MyCity does not leverage this user information to make it easier to apply for benefits or services and does not evaluate this information to proactively recommend what services users are eligible for.

In addition, OTI did not implement a digital wallet that would allow users to access digital versions of City benefits and payment, as promised.

## Benefits

MyCity's Benefits workstream simply redirects the user to the ACCESS NYC website, to which OTI made no enhancements or functional improvements.

ACCESS NYC was designed and developed internally by the Mayor's Office for Economic Opportunity in 2006 and relaunched in March 2017. This website has a screening tool that allows users to determine whether they are eligible for federal, New York State, and New York City health and human services benefit programs and provides users with program information including benefits offered, eligibility, and document requirements, and how to apply.

## Jobs

When OTI initially launched the Jobs workstream, the office simply rebranded an existing City website, Jobs NYC, as MyCity. Like ACCESS NYC, this website was designed and developed internally by the Mayor's Office for Economic Opportunity.

In addition, OTI added information for employers regarding hiring employees, internships, and apprenticeships. Users are provided with brief program descriptions and links to City agencies offering programs including HRA, the City University of New York (CUNY), the Department of Small Business Services (SBS), and the Department of Youth and Community Development (DYCD).

Since the initial launch, OTI has changed the website platform and added information from, or links to, existing New York City or New York State websites.<sup>3</sup> Users still cannot apply for jobs or employer services through MyCity; instead, they are redirected to applicable agency websites, as they were before.

## Business Services

OTI redesigned the NYC Business website to provide information and resources for operating a business with the City, which became the MyCity Business portal. OTI created the "My Business Dashboard" (where users can view and save business transactions) and incorporated an AI

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<sup>3</sup> OTI added a link to the Department of Citywide Administrative Services' (DCAS) CityJobs website, which provides information about City civil service exams, jobs, internships and fellowships, and job training programs (August 2023) and added New York State Department of Labor job board content (December 2024).

Chatbot to answer business related questions. OTI later expanded the Chatbot's purview to include government services and programs.

However, the MyCity Chatbot is still in the beta testing phase and does not consistently provide accurate responses, as detailed later in the report. Additionally, the portal lacks the capability to perform full transactions (such as applying for licenses and permits), as well as an intended feature for scheduling inspections.

Like the other workstreams, the Business portal merely redirects users to various City agency websites, where they can process transactions needed for their business operation.

## Childcare

The only MyCity workstream that enhances user experience is the Childcare portal. MyCity digitized applications to streamline the manual paper application process for certain childcare assistance offered by ACS and DOE and allows users who create MyCity accounts to complete applications online and upload supporting documentation directly through the portal. In March 2024, some two years after the project started, OTI expanded Childcare functionality to allow families receiving benefits to submit their annual recertifications through MyCity. While users can apply for either ACS childcare vouchers or DOE-contracted care programs through the portal, agency notifications and eligibility determinations are still sent via mail or email.

In addition, MyCity offers an optional self-screening tool which provides users with guidance on ACS and DOE program eligibility based on their responses to questions about household income and children's age, among other things.

However, these services are still limited and inefficient. OTI did not build into the online application process basic eligibility checks based on a child's age and household income. If added, this functionality would immediately inform applicants upfront that they may not qualify for childcare services based on information they provided on applications and inform them about other services for which they may qualify.

Automating basic eligibility screening would streamline workflow for agencies by flagging applicants that may not qualify based on information provided on their applications and increase the efficiency of the eligibility and notification process. According to MyCity data, approximately half of the applications submitted through the portal were deemed ineligible. Since its launch, 140,760 applications were submitted through MyCity since inception, of which 65,369 (46%) were ineligible (as of October 2025). This high ineligibility rate may be due, in part, to the system's lack of basic eligibility checks for household income and children's ages.

Furthermore, while MyCity provides users with information about DOE Early Head Start and Head Start programs, users cannot apply for these programs through the portal. Users are advised to contact programs directly and are provided with a link to NYC Public Schools MySchools website.



At the exit conference, OTI officials stated that the New York State Office of Children and Family Services provided guidance regarding the use of computer systems to make benefit or program eligibility determinations or to assist agencies in making such determinations. According to OTI officials, this guidance prohibited OTI from using MyCity to determine eligibility or to assist agencies in determining eligibility for childcare programs based on children's age or household income. After the exit conference, OTI cited the Codes, Rules and Regulations of the State of New York, Title 18, Section 404.2, which states that the "social services district shall be solely responsible for the determination of eligibility for services."

While MyCity may not be used to prevent applicants from submitting applications or make final eligibility determinations, implementing basic logic checks for children's age and household income could alert applicants and agency personnel of potential ineligibility and speed processing and notification timeframes. These actions are not prohibited.

In its formal response, OTI stated that digital wallet was a concept in MyCity's early planning stages, and that after evaluating the concept they determined there was no validated business or users' case to justify expending public funds. However, OTI included the digital wallet in its budget plans for FY 2025 and continued the request in the FY 2026 budget. The audit team is concerned that the agency has requested funding for a feature it has no plans to implement, raising serious questions about the justification for this expenditure.

## Poor Project Management and Oversight

According to IBC's recommendation, purchasing an existing commercial off-the-shelf (COTS) product instead of developing one in-house would reduce implementation time and costs, lower maintenance needs, and could reduce the procurement time through a single contract. However, OTI did not provide any "build-versus-buy" cost estimates for the MyCity project or disclose its final decision on this matter.

Instead, OTI spent approximately \$100 million through more than 120 agreements (including contracts, purchase orders, and delivery orders) to plan, design, develop, and implement MyCity. These agreements included critical roles such as project management oversight, developers, and quality assurance. Further, OTI has requested an additional \$80.9 million, which the office reported will primarily be used to maintain existing functionality and implement additional system integration functionality.

OTI used Azure DevOps (DevOps) as its project management tool to oversee the entire project lifecycle, including project scopes, deliverables, and timeframe. Within DevOps, project scopes, deliverables, task assignments, tests, and releases are tracked. To ensure effective project management oversight, the audit team requested the initial project planning and design documents for the main portal, childcare, and business workstreams from the vendor responsible

for the development. These documents include the intended functional requirements, project deliverables, and the proposed timeframe.

Despite multiple requests over six months, the agency did not provide adequate documentation to support project oversight of system deliverables. Specifically, OTI did not provide the migration plan, findings and recommendations, finalized requirements package, or detailed implementation roadmap created by the vendor for the Business workstream.

Furthermore, OTI was unable to provide adequate documentation to demonstrate that appropriate analysis and planning was performed by the vendor for the MyCity portal. Specifically, OTI did not provide documentation supporting deliverables related to gap analysis, finalized project workstreams, or implementation timelines by workstream. In the absence of such documentation, the audit team concludes OTI had inadequate project management controls.

Additionally, the audit team requested clarification regarding certain features for MyCity that were planned but never implemented, such as the ability to schedule inspections through the Business portal, vaccination appointments in the Childcare portal, and displaying the number of site visitors in the portal. Although OTI engaged with the vendor to define the final requirements, these requirements were not implemented. OTI stated that such features were suggested in presentations, original proposals, or requirements documents, and did not require agency implementation. OTI, along with its business stakeholders, determined which suggested features warranted implementation. In the absence of this information, the audit concludes that OTI did not establish specifications.

OTI officials stated that they did not incorporate the vaccination appointment feature as originally planned since the Department of Health and Mental Hygiene (DOHMH) already had a scheduling tool on its website. OTI stated that it could potentially integrate this feature into MyCity in the future, but this is not currently on the roadmap. Furthermore, OTI officials stated that they could not implement the inspection scheduling feature due to policy changes required by other City agencies. This justification is inconsistent with the stated goal of providing a one-stop shop to consolidate and integrating individual agency website functionalities.

At the exit conference, OTI officials stated that the agency, not the vendor, had conducted a build-versus-buy analysis for the MyCity project. OTI stated that relying on a COTS solution and a single vendor posed a risk. The audit team understands that the choice of solution is determined by the agency; however, this decision should be based on a documented analysis. As a follow-up, the audit team requested that OTI provide supporting documentation for this analysis. To date, this has not been provided.

# MyCity's Low Performance Impacted User Experience

As a project intended to serve the people of New York City, user experience is a critical factor in determining the success of the MyCity portal. It influences user satisfaction, engagement, usability, and efficiency.

To assess user experience, the audit team conducted non-intrusive scans of the MyCity environment, including the Childcare, Business, and Jobs portals, and identified several performance issues related to these sites, including speed index issues related to page loading, high blocking times affecting input and page response time, and slow JavaScript running time. Consequently, these issues negatively affect user experience while navigating the portal.

The scans also revealed poor performance scores for the ACS childcare voucher and DOE-contracted care sites. The new mobile site for the childcare voucher scored 7 out of 100, while the desktop version scored 9 out of 100. Similarly, the contracted care site scored just 4 out of 100 for mobile and 9 out of 100 for desktop.<sup>4</sup>

The findings from the scan reports were forwarded to OTI officials for review on July 28, 2025. On September 11, 2025, OTI officials provided an estimated timeline for completing their analysis by December 31, 2025, with remediation expected by June 30, 2026. While the team is pleased that OTI is taking actions, the extended timeframe means that these issues persist.

OTI's *Citywide Policy for Performance Testing of Public-Facing Applications* states that performance testing must be conducted and meet specified exit criteria prior to deployment. This includes meeting minimum performance standards for average page response and upload times and the application functioning as expected throughout the duration of the test, among other things. In addition, the performance test results must be approved by OTI's QA Director and Business Project Managers. OTI officials stated that performance tests were conducted prior to each release. The audit team requested the test results and approvals for the most recent releases.

At the exit conference, OTI officials again stated that they conduct performance tests. However, OTI did not provide documentation to show compliance with required standards, such as meeting minimum performance benchmarks or satisfying specified criteria prior to deployment.

After the exit conference, OTI provided some recent performance scans for Childcare, Business, Jobs, and Chatbot which included the results of the stress, endurance, and stability tests. These tests identified certain response times that did not meet the specified minimum performance

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<sup>4</sup> Based on the Google Lighthouse numeric values: 0 to 49 indicates poor performance, 50 to 89 needs improvement, and 90 to 100 represents good performance.

benchmarks, which require an average page response time under three seconds and a 90th percentile page response time under five seconds. OTI's scans identified slow page loading and response times related to logins, viewing recommendations, and uploading documents, among other things. For example, OTI's tests showed it took more than 24 seconds to load the "ChatNow" feature on the landing page and more than 11 seconds to load the "Business Recommendations" login page; the 90th percentile transaction response times for the Chatbot 311 questions are between 12.4 and 16.2 seconds and therefore do not meet the standard.

## MyCity Chatbot Provides Inaccurate Information and Inconsistent Responses

As part of MyCity's Business workstream, OTI developed an AI Chatbot to answer users' questions about services and benefits for business owners. The Chatbot was launched in September 2023; in March 2025, it was expanded to include content from the 311 service.

However, the MyCity Chatbot has provided inconsistent responses to inquiries related to City businesses. In early 2024, users reported that Chatbot provided incorrect and inconsistent answers to identical questions.

The MyCity portal has two mechanisms to obtain user feedback on the AI ChatBot: a feedback form that allows users to rate the ChatBot on a scale of one to five stars and provide comments, and "thumbs up" and "thumbs down" buttons that also allow users to submit comments. According to OTI data, more than 2,200 questions were asked in July and August 2025, and 70 respondents provided "thumbs up" or "thumbs down" user feedback. Of these, 50 out of 70 respondents (71.4%) submitted negative feedback, indicating their dissatisfaction with the Chatbot's answers. Furthermore, 19 out of 70 respondents indicated that the response was not helpful.

OTI officials stated that they review the Chatbot reports to evaluate and analyze user responses, including number of user prompts and questions asked, the accuracy of the responses, and areas for improvement. The July and August 2025 reports provided by OTI identified several high- and medium-priority issues that needed to be remediated, including language problems and inconsistent or inaccurate responses.

The Chatbot should have responded to questions about certain appropriate topics—such as trash collection schedules, business licenses, and cash assistance. Instead, these questions elicited the response: "I'm sorry, but I don't have information on that. My knowledge is currently limited to New York City government topics." These inaccurate and inconsistent responses have led to dissatisfaction and may result in misleading information being provided to users.

This weekly report also included OTI's analysis of 48 user questions to which the Chatbot should have responded. It did not answer 23 questions related to government services and programs, five of which were related to childcare services. Specifically, the Chatbot did not provide a

response to questions regarding the current NYC Mayor, ACS Commissioner, and childcare application process.

The audit team conducted independent reviews to assess whether previous issues had been resolved. However, the Chatbot *still* provided inconsistent responses to identical questions. For instance, when asked about business trash disposal, the Chatbot initially responded that “I’m sorry, but I don’t have information on that. My knowledge is currently limited to New York City government topics.” When asked the same question again, the Chatbot provided a detailed answer.<sup>5</sup>

User syntax and word choice also affected the outcome of responses. For example, the Chatbot did not generate an informative response when asked, “any summer camp park program for kid 5 year old” [sic]. However, the Chatbot provided a detailed response when the team rephrased the question (“any summer camp park program for 5 year old kid”). Similarly, the use of “NYC” versus “nyc” also affected the outcome of Chatbot responses. Subsequently, users with learning disabilities or those who speak English as a second language may be disproportionately impacted.

This issue was discussed with OTI officials, who acknowledged the inconsistencies and noted that, as a “generative AI,” the information produced may not always be consistent. While this may be true, according to the National Institute of Standards and Technology’s (NIST) *Artificial Intelligence Risk Management Framework*, AI systems should demonstrate reliability and consistency across various circumstances.

OTI reported that they had remediated some issues and updated the Chatbot site with a disclaimer that it is in the beta testing phase and may give inaccurate or incomplete information. According to OTI officials, there are no plans to move the Chatbot out of beta testing.

Based on the information provided regarding content governance and updates, OTI continues to update the backend data, which may cause the Chatbot’s responses to not always be consistent.

In its formal written response, OTI asserted that it shared data with the Comptroller demonstrating that, week-to-week, the Chatbot consistently provides over 95% accuracy in its generated responses, has nearly zero hallucinations, and negative feedback hovers around 2.25% of all responses.<sup>6</sup> However, OTI calculated the Chatbot accuracy rate based on the “Count of User Prompts Recorded (Q&R)” as opposed to the “Number of User Prompts (Questions Asked).” This resulted in higher accuracy rates. Had OTI calculated accuracy rates based on the number of

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<sup>5</sup> The audit team asked “For my restaurant, I can dispose of my trash 5 ft away from my property line?”

<sup>6</sup> OTI defines a hallucination as the Chatbot providing a response that is false or fabricated by the Chatbot. This includes providing answers based on content outside of MyCity Business or NYC311 and ungrounding which OTI defines as instances in which the Chatbot provides a response that is detached from factual or contextual reality, leading to misleading or incorrect information.

questions asked, rates would have ranged from 84.8% to 92.7% for August 2025. OTI's accuracy rate also does not include responses it categorized as having "Room for Improvement."

In addition, we question the reliability of OTI's Chatbot Weekly Production Report. The report provided for August 2025 did not record any inconsistent responses but as stated above, the audit team's independent testing found that the Chatbot could not consistently provide information when asked the same question.

Regarding negative feedback, OTI's own Chatbot Weekly Production Report calculates negative feedback based on the number of respondents who provided "thumbs up" or "thumbs down" user feedback. In its response, OTI appears to now be asserting that negative feedback should be calculated based on the total number of user prompts, which inappropriately assumes that users who don't respond are satisfied with the Chatbot. As previously stated, of the users who submitted feedback, 71% expressed dissatisfaction with Chatbot responses.

## MyCity Portal Does Not Track City Agencies' Performance

On OTI's website, MyCity is promoted as "[o]ne-stop for all city services and benefits," and Mayor Eric Adams is quoted as saying, "I made a commitment to New Yorkers that we would leverage technology to improve the delivery of government services and track agency performance in real time, and we are doing just that."

However, when the audit team requested information related to this aspect of OTI's functionality, OTI officials stated that MyCity does not track agency performance. Although it was initially expected that agency performance would be available within MyCity, this no longer seems to be the case.

At the exit conference, OTI officials stated that MyCity was never intended to track agency performance in real time, which contradicts the information posted on the MyCity website.

# Recommendations

To address the abovementioned findings, the auditors propose that OTI should:

1. Conduct a comprehensive review of the project's technical, economic, legal, and operational feasibility to determine whether to continue, modify project scope, or terminate the project to minimize resource waste.

**OTI Response:** OTI stated that it disagreed with this recommendation and the underlying findings. Nevertheless, OTI stated that the agency “welcomes the opportunity for a level-setting MyCity program review that would examine alignment with new administration priorities and ensure the resources necessary to deliver the vision to continue to make city services and benefits easier to access for New Yorkers.”

2. Develop a clear and detailed project plan for MyCity’s end state, with detailed functional requirements and time and cost benchmarks.

**OTI Response:** OTI disagreed with this recommendation and stated the audit team is judging the program using a “rigid project management model.”

**Auditor Comment:** OTI has spent approximately \$100 million so far and has requested an additional \$81 million in the 2026 budget. To ensure effective project management oversight and accountability for City resources going forward, OTI should identify and document the incoming administration’s priorities and develop a clear and detailed project plan for MyCity with system requirements, implementation timelines, and cost estimates, and hold vendors accountable for associated deliverables.

3. Establish a dedicated project management team responsible for ensuring that short and long-term project goals are met and completed on time and within budget.

**OTI Response:** OTI disagreed with this recommendation but acknowledged that “it would be beneficial to have a larger in-house technical team to build institutional knowledge and rely less on consultants” and that “there have been staffing challenges since the beginning of this project.” OTI inaccurately asserted that the auditors never requested a count of individuals working in project management related roles.

**Auditor Comment:** OTI was asked for but did not provide a count of the program’s project management related roles. The audit team requested a detailed list of project managers and their defined roles and responsibilities. This was not provided; OTI instead submitted only generic role descriptions.

The audit team also requested the initial planning, system design, project roadmap, and implementation timeline, all of which fall under IBC responsibilities.



According to OTI, generic project management's responsibilities include, but are not limited to, leading planning, execution and delivery of programs adhering to the project timelines and budget. Additional responsibilities include coordinating, collaborating, and communicating with cross-functional teams and stakeholders. However, managing long-term project goals was not included among their assigned responsibilities.

4. Hold vendors accountable for expected deliverables, timelines, budgets, and standards.

**OTI Response:** OTI disagreed with this recommendation, asserting that it has held vendors accountable.

**Auditor Comment:** As detailed in the report, the audit team repeatedly requested but was not provided with evidence that IBC produced key contract deliverables. At no point did OTI provide the requested information or evidence to demonstrate that changes in deliverables were authorized.

The Rules for the City of New York, Section 4-02 states that changes to contracts must be authorized and reflected in change orders, and changes in contract amounts due to authorized omitted work require appropriate price and cost analysis to determine reasonableness. Based on the audit team's independent review of IBC contracts for design and development services, OTI submitted change orders for two IBC contracts for design and development services to increase the contract amounts for added deliverables. OTI did not at any point request the elimination of existing deliverables.

5. Develop and implement eligibility criteria to alert or prevent submission of ineligible childcare applications.

**OTI Response:** OTI disagreed with this recommendation, stating that the New York State Social Services law limits eligibility determinations to social service agencies. Additionally, OTI stated that eligibility determinations cannot be sufficiently automated because there are New York State approved eligibility exceptions to age limits based on a child's special needs and to income limits based on homelessness or other factors.

**Auditor Comment:** As stated in the report, while MyCity may not be used to prevent individuals from submitting applications based on children's age or household income limits, implementing basic logic checks is not prohibited, and moreover, could alert applicants and agency personnel of potential factors impacting eligibility and New York State approved exceptions. This may reduce processing and notification timeframes and provide applicants with useful information.

6. Ensure that MyCity meets minimum standards as specified in the Citywide Policy for Performance Testing of Public-Facing Applications.

**OTI Response:** OTI disagreed with the recommendation, arguing that "MyCity already meets/exceeds minimum standards." In addition, OTI stated that the transactions from its

performance scans are classified as complex transactions and therefore, fall in the category of 30 second average response time and 50 seconds on 90<sup>th</sup> percentile.

OTI further alleged stated that the tool used by the audit team to test performance was flawed, unreliable, and does not have the parameters necessary to accurately test performance.

**Auditor Comment:** OTI's own performance scan reports showed multiple response-time scores outside the parameter criteria of 3 seconds on average and 5 seconds 90<sup>th</sup> percentile for simple transactions. Specifically, clicking the Chatbot feature on the landing page without submitting questions and accessing the login page are simple transactions. They do not include document uploads or multi-step backend processes that should take over 24 seconds of response time. There is a significant gap between the 3 to 5 second parameter specified in OTI's Citywide policy for performance testing and the 30 to 50 second parameter OTI asserted should be used.

In addition, Google Lighthouse is a widely used and reliable tool for auditing web performance, accessibility, identifying issues, suggesting fixes, and providing insight or measurement. OTI is responsible for ensuring that the performance standards it sets are adhered to across agencies; it should at the very least ensure that OTI systems fully comply.

7. Conduct structured testing exercises (also known as "AI red-teaming") to probe the Chatbot to find flaws and vulnerabilities (such as inaccurate or inconsistent responses), improve data quality, and inform decision-making regarding future enhancements and use.

**OTI Response:** OTI disagreed with the recommendation, asserting that they already conduct AI red-teaming and other testing measures. OTI again argued that the MyCity Chatbot has an accuracy rate of 95-99%.

**Auditor Comment:** As part of its formal response, OTI provided a one-page summary for the test performed for the Chatbot in 2023; however, it lacks sufficient detail for the audit team to assess whether inaccurate or inconsistent responses were tested or how frequently testing occurred.

As stated in the report, the user experience feedback for July and August 2025 indicated very high rates of dissatisfaction with Chatbot's answers and that responses were not helpful. The numbers reported were based solely on the provided user feedback and were neither inflated nor projected. The team's independent review of the Chatbot responses also revealed inaccurate and inconsistent answers.

## Recommendations Follow-up

Follow-up will be conducted periodically to determine the implementation status of each recommendation contained in this report. Agency reported status updates are included in the Audit Recommendations Tracker available here: <https://comptroller.nyc.gov/services/for-the-public/audit/audit-recommendations-tracker/>

# Scope and Methodology

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). GAGAS requires that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions within the context of our audit objective(s). This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit covered the beginning implementation of MyCity Childcare in January 2022 to November 2025.

To understand OTI management structure and operations, the auditors requested the agency-wide and bureau-wide organizational charts, and viewed OTI's *Mayor's Management Report* for Fiscal Years 2022, 2023, 2024, and 2025.

To understand the project scope and contractor's responsibilities, auditors reviewed contracts and amendments, data sharing agreements, functional matrixes, project status reports, and workflow diagrams for system development.

In addition, the audit team conducted system walk-throughs with OTI project managers to gain an understanding of how users of the MyCity application completed the process of applying for or obtained services related to childcare, job placement, small business resources, or other New York City benefits and common services. The team also met with OTI officials to review the MyCity Chatbot functions, creation, and processes.

Furthermore, the auditors also performed systems functional tests in the production and non-production environment to determine whether the system performed as intended and met the overall goals as stated in the system specifications and public briefings. The auditors performed independent performance assessments of the MyCity website to determine whether the agency monitors and considers website performance. Additionally, the auditors tested the accuracy, reliability, and consistency of responses provided by MyCity Chatbot in response to legitimate government procedural inquiries, previously documented problematic responses from media reports, and inappropriate content handling protocols. Furthermore, the auditors tested the accuracy, reliability, and consistency of responses provided by MyCity Chatbot in non-English languages.

The auditors reviewed NIST, GAO, and New York State frameworks: NIST AI RMF 1.0: *Artificial Intelligence Risk Management Framework*, NIST AI 600-1: *Artificial Intelligence Risk Management Framework: Generative Artificial Intelligence Profile*, NIST.SP.800-37 Rev.2: *Risk Management Framework for Information Systems and Organizations - A System Life Cycle Approach for Security and Privacy*, NIST SP 800-53 rev. 5 *Security and Privacy Controls for*

*Information Systems, GAO-21-519SP: Artificial Intelligence: An Accountability Framework for Federal Agencies and Other Entities, and NYS-P24-001: Acceptable Use of Artificial Intelligence Technologies.*

To determine whether MyCity streamlines the delivery of services and benefits and allows the City to track agency performance in real time, the auditors used the following policies as criteria for OTI's compliance with the City requirements:

- OTI's policies including: *Citywide Cybersecurity for the Usage and Development of Artificial Intelligence (AI) Systems Policy, Citywide Policy for Performance Testing of Public-Facing Applications, Citywide Policy on Cloud, and The New York City Artificial Intelligence Action Plan.*
- OTI NYC Cyber Command's policies and standards including: *Citywide Application Security Policy, Citywide Application Security Standard, and Citywide Cybersecurity Program ("Citywide CSP").*

Although the results of the above tests were not projectable to their respective populations, these results, together with the results of the audit procedures and tests, provided a reasonable basis for the audit team to evaluate and support the findings and conclusions within the context of the audit objective.



December 19, 2025

Maura Hayes-Chaffe  
Deputy Comptroller for Audit  
NYC Office of the Comptroller  
1 Centre Street  
New York, New York 10007

Re: Audit of the NYC Office of Technology & Innovation's MyCity System (IT25PAR20028)

Dear Deputy Comptroller Hayes Chaffe:

The Office of Technology and Innovation ("OTI") appreciates the opportunity to provide a formal response to the Office of the New York City Comptroller's draft report titled "Audit Report on the New York City Office of Technology and Innovation's MyCity System, dated December 8, 2025 (hereafter referred to as the "Report"). OTI recognizes the value of assessing MyCity at this stage of the program, to determine whether "MyCity makes it easier for New Yorkers to access benefits and services" as described in your initial audit scope.

OTI's response which addresses the findings and seven recommendations made by the Office of the New York City Comptroller in this audit is attached. As detailed in the response, OTI disagrees with nearly all of the recommendations in the Report.

Our team remains available should you have any questions regarding our response.

Regards,

A handwritten signature in black ink, appearing to read "Matthew C. Fraser", is written over a faint, circular official stamp.

Matthew C. Fraser  
Chief Technology Officer

cc: Chantal Senatus, Deputy Commissioner for Legal Matters  
Simeon Sentino, Acting Director, Risk Management and Compliance, OTI  
Jean-Claude LeBec, Director, Mayor's Office of Risk Management and Compliance  
Doug Giuliano, Deputy Director, Mayor's Office of Risk Management and Compliance  
Maryanne Mullany, Assistance Comptroller  
Hau Wong, Audit Manager  
Jenny Su, IT and Cybersecurity Audit Supervisor

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**OTI Response to Audit Report on the MyCity System**

The MyCity Platform is a complex and multifaceted system that serves all New Yorkers. The system is meant to become a hub that provides a streamlined point of entry where all New Yorkers can submit applications and track the status of their city services. There are hundreds of city services and functions. Because this is a tremendous undertaking, the development of the platform has been approached in phases, and several workstreams have been prioritized and developed so far: Child Care, Business, Jobs, and Common Services.

The Common Services workstream has provided the infrastructure necessary to allow more city services to be integrated onto the MyCity Platform. MyCity also incorporates an integrated Benefits Engine, which tells users whether they may be eligible for other benefits, as well as MyCity Chatbot, the beta AI generative application which provides responses to questions about City services.

MyCity also provides user content that was curated to facilitate New Yorkers' access to other city websites to apply for services. Additionally, the customer may save documentation for future use when applying for services currently integrated with MyCity. As MyCity continues to further evolve, it will continue to create efficiencies in how New Yorkers interface with City agencies and apply for services. The complexity of building MyCity should not be minimized. It is an effort that has required the commitment and participation of various divisions within OTI, including but not limited to Applications, Strategic Initiatives, Office of Legal Matters, Office of Data Analytics, Office of Information and Privacy, and Cyber Command. It also required the input of various vendors, working under OTI's supervision, through various stages of this program over the last three and a half years.

MyCity has provided numerous benefits thus far. For example, the Child Care Portal, part of the first phase of the program, enables New Yorkers to apply for benefits without going through the cumbersome paper-based application process or appearing in-person at a City facility to obtain assistance. To date, more than 150,000 applications and recertifications have been submitted for Child Care subsidies through MyCity. Today, approximately 81 percent of applications for Child Care benefits are processed through MyCity. The Childcare Portal has a satisfaction rating of 4.3 stars out of 5.

As detailed below, the Comptroller's "Audit Report on the New York City Office of Technology and Innovation's MyCity System" (referred to as the "Report") materially misrepresents both the scope and substance of what has been delivered and omits critical platform-level achievements that are foundational to MyCity's design. The Report simplifies the concept of the "one-stop shop," and assumes a future-state vision where the audit team can easily assert that the goals of MyCity were not met. It is within this context that this Report grossly misstates the intent and functionality of MyCity and reflects that the audit team did not have the level of technical expertise needed to adequately assess the various aspects of the program.

The Report also wrongly assumes that OTI must follow a rigid project management model (Waterfall SDLC model) to accomplish those goals rather than by using a modern, iterative IT project management model (Agile Project Management) that is more suited to a program of this size and scale. As a result, the audit fails to recognize that OTI developed a clear and detailed project plan through which the scope,



sequencing, and delivered objectives could be evaluated. This Report, through these limitations, disregards much of the work that city agencies, including OTI, have invested in the MyCity program. Because of the forgoing, OTI finds it necessary to include a background section and specifically address these findings as part of the response to the recommendations.

### **Background**

MyCity was designed as a phased platform and single point of entry—not as an immediate replacement for all agency systems or a single universal application across unrelated services. MyCity’s core intent is to centralize identity, documents, notifications, service history, and service discovery while providing reusable services that agencies can integrate with over time. Delivered and in-progress capabilities—including profile reuse, document vault, benefits recommendations, and inbox/outbox functionality—demonstrate deliberate progress toward reducing fragmentation. OTI worked with multiple stakeholders, including federal, state and local agencies, to obtain all necessary approvals to remain in compliance with all relevant legal and policy requirements.

A “one-stop-shop” was never intended to replace individual agency website functionalities. It would be irresponsible and a waste of city resources not to evaluate the extent to which each service may need to be integrated. However, it is also much more than a “rebranding” of city websites.

### **Child Care**

The Child Care workstream, focusing on child care assistance through the NYC Administration for Children’s Services (ACS) and the New York Public Schools (NYPS, formerly known as the Department of Education) has delivered end-to-end digital functionality for applications, recertifications, mid-year updates, document management, notifications, accessibility, security, and performance—replacing a prior manual, paper-based process.<sup>1</sup> Additionally, as one of its features, the applicant can track the status of their application.

This workstream addresses a major source of frustration for applicants under the previous system in which applicants had to juggle two separate Child Care systems—ACS child care vouchers and NYPS-contracted care programs. Under the old system, unless the applicant was aware of each program’s specific requirements, they could waste precious time on rejection from one agency only to start the lengthy paper process with the other.

### **Benefits**

The Benefits Engine is not a portal, but rather an innovative feature that did not exist previously. MyCity has utilized its integration with ACCESS NYC, a mature and established benefits platform, so that Child Care applicants and MyCity account holders are provided benefits recommendations using information shared by the user through Common Services. The potential benefits recommendations include Pre-K and 3-K, SNAP, Cash Assistance, Fair Fares, Summer Youth Employment and more. ACCESS NYC

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<sup>1</sup> The Report notes that agency notification and eligibility determinations are “still” sent via mail or email. State policy requires that all families must be notified of eligibility by mail. MyCity also emails families reminders about submitting their application as well as notifications of eligibility determinations. Applicants can also log back into the portal and see their status. Before MyCity, the agencies would email families, but this was inconsistent, and not all families included their email address on the paper applications.

leverages anonymous user information, but the Benefits Engine uses real applicant information to recommend other benefits for which the applicant may be eligible. MyCity focuses on improving access across programs without replicating existing systems, creating efficiencies wherever possible. MyCity Benefits Engine is the first digital application in the city to use the City's Benefits Screening API to seamlessly inform residents about other benefits for which they may be eligible without re-entering any information. Over 40 percent of applicants utilize this feature.

### Business

The Business site provides integrations with NYC Small Business Services web content, incorporating curated, organized content to help businesses find information more quickly, as well as wizards to tailor information to their needs. Business site content compiles hundreds of applicable regulations into one place along with emergency preparedness information and tools. Additionally, the Business functionality has been integrated with the MyCity profile and dashboard where businesses are able to track and identify transactions related to their businesses. These improvements reduce duplicate records, improve accuracy, and allow businesses to view their service history for data-integrated services in one place, helping businesses take action with confidence and save time.

### Chatbot

Chatbot was first incorporated into the Business Portal, where the source material included content from the MyCity Business website, covering step-by-step guidance on opening and operating different kinds of small businesses, information on local taxes, registration, and licensing requirements, as well as an introduction to training programs, workshops, and city-backed resources. The content was subsequently expanded to include the knowledge articles from the 311 platform, such as general inquiries (e.g., parking updates, garbage collection, licensing and permits). The Chatbot remains in beta version as the agency continues to assess this Artificial Intelligence tool. OTI shared data with the Comptroller demonstrating that, week-to-week, it consistently provides over 95 percent accuracy in its generated responses, has nearly zero hallucinations, and negative feedback hovers around 2.25 percent of all responses. It is governed, monitored, and continuously improved, with delivered upgrades to infrastructure, security, accessibility, and content coverage; additional reliability and accuracy enhancements are in progress.

### Jobs

The MyCity Jobs site has two workstreams. [Jobs.nyc.gov](https://jobs.nyc.gov)'s objective is to improve access to job opportunities, education and training for job seekers. To accomplish this, OTI took an existing website, simplified its content and UX and re-platformed it to a scalable infrastructure. The revamped website provides centralized education and training programs and a dedicated NYC job board built with NYS at no build or maintenance cost. [Cityjobs.nyc.gov](https://cityjobs.nyc.gov)'s objective is to acquire new talent for the city by making it easier to find and apply for NYC government jobs. The new website is twice as fast, search engine friendly and fully accessible. The streamlined online experience decreases application time by 50 percent, thus increasing the number of applicants who apply to NYC jobs. OTI has doubled the previous application rate of 3,000 applications per day. Modern search and candidate review capabilities help

Human Resources and hiring managers across 66+ agencies identify top talent and ultimately cut down on administrative tasks.

#### Common Services

OTI has delivered a fully operational Common Services platform that includes secure, reusable resident and business profiles, document vault functionality, notifications, analytics and monitoring, shared UX components, enterprise infrastructure, and standardized integration tools for agencies. The Document Vault feature provides a secure place within the MyCity account where, with the site user's consent, documents being uploaded within an application for the first time are saved into the vault for easy uploads into different future applications.

This Java-based and supportable foundation provides re-usable services that agencies can utilize or integrate with instead of creating new services on their own, provided they comply with specific standards. This also allows their users to leverage what they already have in the document vault or add to it from that downstream system. Similarly, agencies can take advantage of the MyCity short code, a complicated undertaking that effectuates SMS notifications within the agencies' integrated applications.

These services are live, actively used, and intentionally designed to reduce duplication, improve data accuracy, and enable future agency onboarding without rebuilding core capabilities.<sup>2</sup>

Any foundation requires investment and careful design and architecture. OTI is building out the infrastructure that is intended to grow with City needs. MyCity is primed to host future agency integrations through available APIs, an integration playbook, and reusable common services.

#### Agile Project Management

Agile project management is a technology industry best practice and a critical component of developing and implementing a successful system. It is an iterative approach that is flexible, breaking down large projects into smaller, manageable workstreams and cycles (also referred to as 'sprints'). This project management model's key elements are cross-functional teams that meet regularly to ensure that goals are being met, recurring stakeholders' meetings, iterative development and prioritization of customer results.

Agile adapts, so adhering to a list of requirements at the beginning is not part of an industry recognized best/better methodology of delivery.

OTI uses Azure DevOps, a comprehensive application, to track the progress of the various projects within MyCity. OTI demonstrated the aspects of this methodology, including scrum of scrums (SoS)

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<sup>2</sup> Although the Report characterizes Common Services as not leverag[ing] user information to make it easier to apply for benefits or services and... not evaluat[ing] this information to proactively recommend what services users are eligible for," this is actually part of the function of the Benefits Engine.

governance, program increment planning, integrated scheduling, feature- and user-story-level tracking in Azure DevOps, as well as weekly velocity measurement across workstreams. As MyCity has been actively managed using established Agile delivery practices, OTI retains oversight of scope, priorities, and vendor performance.

Research confirms that, ultimately, traditional waterfall methodologies often yield inconsistent delivery outcomes, while Agile and scaled-Agile approaches (such as SAFe) significantly improve delivery predictability, responsiveness, and quality. A recent case study, “Risk Management for Enterprise Agility,”<sup>3</sup> highlights how moving risk and governance closer to Agile teams permits faster value delivery *without increasing enterprise risk*.

MyCity’s return on investment must be evaluated in light of what has been delivered and future scaling opportunities: a secure, reusable Citywide platform; digitized high-volume services; measurable improvements in workforce and business engagement; and a clear pipeline of in-progress integrations that build directly on the existing foundation.

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<sup>3</sup> Case Study: Risk Management for Enterprise Agility, Heyes J., Gelders R., Capella J. (2023, June 2); Another resource, The End of the Waterfall as We Know It, Gartner (2016, January 29), outlines these limitations with waterfall and endorses Agile as the superior alternative.

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**Responses to Recommendations**

- 1. Conduct a comprehensive review of the project's technical, economic, legal, and operational feasibility to determine whether to continue, modify project scope, or terminate the project to minimize resource waste.**

**OTI Response: Disagree**

OTI welcomes the opportunity for a level-setting MyCity program review that would examine alignment with new administration priorities and ensure the resources necessary to deliver the vision to continue to make city services and benefits easier to access for New Yorkers. However, we disagree with the findings that underly this recommendation for the following reasons:

- a) The Report fails to recognize that the over-arching goals of MyCity were not intended to be accomplished in a few years. The vision was always a multi-year, on-going project where we continue to onboard other city agency applications through Common Services. Additionally, there are many factors that go into the overall picture of what may be accomplished, including staffing needs, funding, and agencies' technical ability to integrate.
- b) Choosing not to build a feature in the absence of demonstrated value reflects sound product governance, not a failure to deliver or a failure of the vision. For instance, we discussed “creating a universal application and verification process,” as well as creating a digital wallet as concepts in MyCity’s early planning stages. However, we decided after careful consideration that this effort could not be an immediate objective in the MyCity Platform. The audit team did not ask OTI about the digital wallet during the audit. If asked, OTI would have provided information from our evaluation of this concept that determined there was no validated business or user case to justify expending public funds. Early vision concepts do not, by themselves, constitute a responsible basis for implementation.
- c) The audit team’s overreliance on deliverables from the Innovative Business Concepts, Inc. (“IBC”) contracts led to them to erroneously conclude that these contract deliverables represented the full scope for the MyCity program. The audit team declined to accept OTI’s March 2025 representations that consultants for each workstream developed more detailed and specific project plans which were ultimately implemented using an agile and iterative approach—there is not just one plan for all of MyCity. IBC would not have developed a detailed project plan for all of MyCity under this iterative model. During the course of the audit, OTI provided hundreds of pages of responsive documents, including IBC’s high-level detailed road map.<sup>4</sup>

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<sup>4</sup> This disconnect was also reflected in the Exit Summary, concluding that OTI did not conduct a build-versus-buy analysis for the MyCity program. At the December 1<sup>st</sup> Exit Conference, stated that the conclusion was based on OTI

The audit team’s findings were unduly influenced by its belief that MyCity development should follow the Waterfall project management model- an approach we determined did not position this project for success. The Waterfall model is described in the Report as “a linear, sequential System Development Life Cycle (SDLC) methodology that includes phases for requirements for gathering design, implementation, testing, deployment and maintenance.” The Report cites the National Institute for Standards and Technology (“NIST”), stating that “when the waterfall model is used, the requirements are usually well-defined so planning can be done up front.” However, as OTI emphasized to the audit team, MyCity has multiple workstreams being planned, developed, and implemented concurrently. It is not the kind of project with “well-defined” requirements that would lend itself to the Waterfall methodology. As noted above, many things can change over the program length, including technological improvements, budget constraints, and staffing needs. The MyCity program is not linear and it would be inadvisable to do all the planning “up front” under this circumstance.

After the Exit Conference, OTI provided quarterly project increment roadmaps to demonstrate how program increments reflect Agile planning. Rather than acknowledge this, the audit team chose to fall back on its bias toward the Waterfall project planning model, stating that these documents were “not prepared during the MyCity design and development phase.”

- d) The audit team’s assessment relies on assumption and conjecture.
- The audit team did not engage any of the integrating agencies regarding their views of the process prior to the implementation of MyCity. This limits the conditions under which the program’s benefits may be assessed. For example, since 81 percent of applications are now filed online, this allows more time for city employees to examine applicant eligibility based on the right documents being present at the outset.
  - The audit team examined technical improvements from a very high level, giving them short shrift. For instance, there was only a superficial conversation regarding the Common Services workstream rather than a walkthrough. In addition, the Child Care Portal involved more than just the Report’s characterization of “digitizing the

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not having received an IBC deliverable called “build-versus-buy.” OTI explained at that time, that the agency determined that a hybrid model would pose the least financial risk given the at COTS solution lacked flexibility on its own. Given the timeframe provided for response, and the need to address the numerous assumptions, we were unable to produce this documentation in time for this response.

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application.” The audit team also lacked understanding, or failed to recognize, the layers of work incorporated into the Business Portal.

- The Report fails to acknowledge the success metrics detailed in the introduction to this document- application rates, performance statistics from users, which are just a sliver of the positive outcomes of MyCity. For instance, before MyCity launched there were just over 7,000 children enrolled with low-income vouchers, and now there are over 71,000 enrolled children with low-income vouchers. Although the audit team acknowledges that “as of June 2025, more than 120,000 applications and recertifications for child care were submitted through the MyCity child care portal since its launch in spring 2023,” they fail to acknowledge the import of this statistic.

**2. Develop a clear and detailed project plan for MyCity’s end state, with detailed functional requirements and time and cost benchmarks.**

**OTI Response: Disagree**

- a) As noted above, the audit team insists on judging the program based on a rigid project management model, Waterfall, rather than Agile. They pointedly ignored areas where other project controls (around scope and budget) were injected where they mattered most. That bias towards the Waterfall SDLC, along with their failure to acknowledge that there can be more than one way to manage a project, reflects that the audit team continually tried to fit a process with which they were not familiar into their existing narrative. Additionally, the idea that we should define an artificial end state is problematic given that there are hundreds of potential City services that could be integrated based on the administration’s dynamic priorities.
- b) There is no basis for determining that OTI had no project plan in place. OTI provided multiple Azure DevOps demonstrations on July 24, August 18, and September 19 of 2025. We also responded to multiple email requests where our team provided documentation and explained the Agile Project Management method and how OTI used the Azure DevOps application to manage MyCity implementation. Between the Program Increment planning, sprint demos, weekly status meetings, Scrum of Scrums, AzDO tracking, and the use of the Integrated Master Schedule, OTI has had- and continue to have- numerous Project Management controls in place.
- c) This program is complex. As noted above, the audit team applied their understanding of an IT project- where the entire scope of the project has a distinct start and endpoint- through one vendor for installation on agency systems, to evaluate the entire MyCity program. Therefore,



IBC became their main protagonist. Their preconceptions led them to heavily rely on the IBC deliverables to tell the story of MyCity, despite the fact they knew that there were multiple vendors associated with this program.

- In 2022, OTI engaged IBC to provide a system development plan, with the understanding that this would be a starting point that would ultimately provide high-level direction for the various workstreams. We never intended for IBC, which was only contracted for July through September 2022 for this work, to provide the final project plan, roadmap, timeline and cost benchmarks for this project.

After IBC completed their work, OTI contracted with numerous other vendors to provide technical assistance in gathering requirements, project planning, and other support for the various workstreams over the last three years for MyCity. Consultants for each workstream then developed more specific project plans which were ultimately implemented using an agile and iterative approach. Because the program has been designed with an agile and iterative approach (leveraging user research at different periods of time), the plan outlined by IBC in MyCity's early days was never meant to lay out the plan for years to come. Additionally, the SOWs allowed for deviations and certain deliverables were descoped or replaced. It is not realistic to expect that IBC's analysis and deliverables would avoid becoming iterative as the implementation teams delved deeper into the development details of MyCity.

- OTI provided samples of major detailed deliverables that fell under the IBC contracts. The Report states that we did not hold the vendor responsible for deliverables by comparing the list of every single listed deliverable in those agreements. However, this fails to recognize that the major deliverables are based in IBC work on the minor deliverables, and therefore, from OTI's standpoint, IBC fulfilled their obligations under those contracts. OTI sent hundreds of responsive pages to the audit team's request for deliverables that IBC produced. All those deliverables were produced with input from city stakeholders and signed off on the agreed upon work at the time.

**3. Establish a dedicated project management team responsible for ensuring that short and long-term project goals are met and completed on time and within budget.**

**OTI Response: Disagree**

OTI strongly disagrees with this conclusion. As with the second recommendation, this reflects a methodological bias toward Waterfall SDLC and disregards the Agile and Scaled Agile Framework (SAFe) program controls that were demonstrated in multiple meetings with the audit team.

- a) The audit team met with OTI several times regarding our project management methodologies, obtaining that information from a Program Lead, a Program Manager, a Project Manager, and a Technical Project Manager who described the role of the Integrated

Master Schedule with a dedicated Project Scheduler and a SAFe Lead. Yet the audit team never asked for more information or substantive follow-up.

- b) MyCity has had at least 15 project management related roles working across the program. Consultant project managers worked closely with contracted vendors' project managers to track assigned work and coordinate each workstream within the SAFe. Unfortunately, the Comptroller never asked for a count of the program's project management related roles.
- c) In fact, the audit team's singular focus was on IBC, repeatedly calling it "the vendor" for project management results and neglecting to look at how the actual workstreams are managed. Again, OTI demonstrated the Azure DevOps (AzDO) work management tool where each work stream has managed (to date) 53 sprints for Common Services, Chatbot, and the Business site and 67 sprints for Child Care. Further, the audit team only asked for high-level sample documents related to the Scrum of Scrums and did not conduct additional analyses to better understand the workstream delivery themselves.

This cannot be overstated - The focus on vision and planning work of IBC during the first year of the program, rather than substantively comprehending the depth of actually delivering work over the next three years creates an artificial benchmark that has undermined the entire Report.

- d) Ideally, it would be beneficial to have a larger in-house technical team to build institutional knowledge and rely less on consultants, but there is a substantial project team already dedicated to MyCity. Unfortunately, there have been staffing challenges since the beginning of this project.

#### **4. Hold vendors accountable for expected deliverables, timelines, budgets, and standards.**

##### **OTI Response: Disagree**

OTI fully holds its vendors accountable, including managing scope changes when the original scope is not relevant or necessary to avoid waste of city funds. We will continue to hold vendors accountable and always improve.

- a) Vendors are held accountable for deliverables, timelines, budgets and standards. Each contract for MyCity has a designated OTI Project Manager (in-house city staff) who manages the expected deliverables, timelines, budgets and standards for the vendor. The Project Manager works with all the project stakeholders - including Executive Sponsor, Product Manager, and all relevant stakeholders to ensure the deliverables are met to the city's satisfaction before signing off on acceptance. The audit team requested one document that-

from their standpoint- would reflect budget and scope tracking for MyCity. Therefore, when provided with responsive, high-level program documents, they concluded that we did not track deliverables, timelines, and budgets. Although OTI explained that such management was reflected through multiple documents on a workstream level, the audit team was not receptive to examining such documentation.

- b) Additionally, the Report relies on proposed deliverables listed in response to a Request for Proposal instead of what became the final agreed-upon deliverables. SOWs allow for deviations from certain deliverables that were de-scoped or replaced. The audit team's insistence on deliverables that match what was in the RFP demonstrate an ignorance of the contract management process.

**5. Develop and implement eligibility criteria to alert or prevent submission of ineligible child care applications.**

**OTI Response: Disagree**

- a) The audit team misunderstands the role of agencies in determining eligibility and the importance of this manual function. For eligibility determinations, the city is required to do a complete assessment of the applicant's eligibility, as stipulated by the provision OTI previously supplied to the audit team:

18 NYCRR 404 Determination and Redetermination of Eligibility for Social Services  
Section 404.2 Responsibility for eligibility determinations.

- 1. The social services district shall be solely responsible for the determination of eligibility for services.
  - (b) If the acceptance of applications is delegated to a provider under a contract executed in accordance with the purchase of services requirements specified in section 405.2 of this Title, responsibility for eligibility determinations shall remain with the social services district; any requirements that a provider obtain and transmit to the social services district data necessary to make a determination of eligibility shall be specified in the purchase of services contract.

Further, Section 617 of the New York City Charter states that determinations of eligibility for subsidized child care are to be made by a social services agency.

The Report concludes that “[w]hile MyCity may not be used to prevent applicants from submitting application or make final eligibility determination, implementing basic logic checks for children’s age and household income could alert applicants and agency personnel of potential ineligibility and speed processing and notification times.” This ignores the fact that there are State approved eligibility exceptions to both age (based on a child's special needs) and income (based on homelessness and other prioritized categories) that cannot be sufficiently automated at this time.

- b) It is also inappropriate for the audit team to assume that the current ineligibility rate may be “due, in part, to the system’s lack of basic eligibility checks for household income and children’s ages.” The

Report assumes that eligibility is a one-size-fits-all concept.<sup>5</sup> Clearly, they did not conduct an analysis of the eligibility criteria services because there may be extraordinary circumstances that make an individual otherwise eligible. Implementing the Report's recommendation may discourage individuals from applying for services if they receive a rejection for one service.

**6. Ensure that MyCity meets minimum standards as specified in the Citywide Policy for Performance Testing of Public-Facing Applications.**

**OTI Response:** Disagree. MyCity already meets/exceeds minimum standards.

a) The Report does not take into account that response times cannot be categorized without taking into account the different classifications for those response times as noted on Page 7 of the **NYC Office of Technology & Innovation (OTI) Performance Testing Policy**. Below is the reference to Appendix A- Entry/Exit Criteria, on Page 7, detailing the relevant system parameters measured during the tests:

- Page response time under 3 seconds on average
- Page response time 90% under 5 seconds
- For pages based on forms, web services, or built with EMC Documentum:
  - Response time under 30 seconds on average
  - Response time 90% under 50 seconds on average
- Upload valid picture file type (about 2.92MB size) response time under 30 seconds on average
- Upload valid picture file type (about 2.92MB size) response time 90% under 50 seconds on average

MyCity is a complex application that has multiple integrations with other applications hosted on the cloud platform. COTS applications are inherently slower than custom applications. OTI classifies bullets one and two, as relating the simple transactions. Bullet three reflects the system parameter associated with complex transactions and four and five relate to document uploads.

The Report references transactions from OTI's performance scans that are classified as complex transactions and fall in the exit criteria category of 30s response for average and 50s on 90<sup>th</sup> percentile. The Report relies on the parameters for simple transactions to find that OTI does not comply with its policy.

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<sup>5</sup> It is unclear how the audit team came to the conclusion that "programs require much of the same information and documentation to support eligibility" for services across the city. The audit team received numerous documents reflecting the research IBC conducted- including the review of multiple agencies' processes, workflows, and related data elements. Additionally, for example, the Head Start program has an entirely separate application form and process as well as distinct eligibility criteria. Eligibility for this program is also decentralized and is done at the individual provider level.

OTI conducts rigorous stress load testing. OTI's Quality Assurance ("QA") team carefully reviews each of the transactions in the performance test results. The OTI QA team has found that the MyCity applications performance is deemed to be satisfactory using our exit criteria. OTI will continue monitoring for future releases to ensure OTI performance test standards are maintained.

- b) The audit team's Google Lighthouse performance test was flawed and unreliable. This application is an immature, synthetic page audit tool which does not have the parameters necessary to accurately test performance (and certainly cannot be used to assume user satisfaction as extrapolated in the Report). OTI's performance testing is a heavy-weight, enterprise load-testing suite; Lighthouse has several key limitations when used for performance/load testing at scale. It is also recommended that Lighthouse be supplemented with manual testing and RUM tools for real-world data. It is unclear how the audit team has made a logical leap between their Lighthouse scores and user satisfaction. [REDACTED]

**7. Conduct structured testing exercises (also known as "AI red-teaming") to probe the Chatbot to find flaws and vulnerabilities (such as inaccurate or inconsistent responses), improve data quality, and inform decision-making regarding future enhancements and use.**

**OTI Response: Disagree.**

OTI currently conducts AI red-teaming as well as other testing measures. As noted in OTI's ChatBot Presentation created for the September 5, 2025, demonstration meeting with the audit team, OTI conducts weekly reviews of chatbot responses to ensure accuracy, relevance, and the prevention of biased or discriminatory responses. Content and conduct tuning may be updated based on high-priority issues. OTI also monitors the chatbot for inappropriate usage (spam, offensive content, fraudulent attempts, and inquiries unrelated to government services).

The Report grossly inflates the gap between 100 percent perfection and any need for improvement. The reliance of the audit team on isolated examples without proportional context does not reflect overall system performance. Additionally, despite best efforts, the nature of generative AI does pose potential risks of inconsistent responses to the same exact question. OTI strives for 100 percent accuracy with the understanding that responses will vary. This requires ongoing tuning and testing. Currently, MyCity Chatbot has an accuracy rate of 95-99%.

## Appendix A- EntryExit Criteria

The NYC Office of Technology & Innovation (OTI) Performance Testing Policy has 3 different classifications of application response times. Below is a reference to the section on Page.7 detailing the difference:

Exit Criteria	Exit criteria out of Performance Test are as follows:
	<ul style="list-style-type: none"> <li>• Execution of the following mandatory tests are fully complete (see Required Performance Tests): <ul style="list-style-type: none"> <li>○ Stress Test</li> <li>○ Stability/Soak/Endurance Test</li> </ul> </li> <li>• System parameters measured during the tests are as follows: <ul style="list-style-type: none"> <li>○ Peak CPU <b>utilization</b> is 65% or lower</li> <li>○ 40/60 distribution between load balancers</li> <li>○ Memory utilization not exceeding 80%</li> <li>○ No memory use build up during the test and immediately after</li> <li>○ No memory leak recognized after the test is complete</li> <li>○ Database is not exhausted during the test, no errors occur, and the application is functioning as expected throughout the duration of the test execution</li> </ul> </li> </ul>
Simple Transaction	<ul style="list-style-type: none"> <li>○ Page response time under 3 seconds on average</li> <li>○ Page response time 90% under 5 seconds</li> </ul>
Complex Transaction	<ul style="list-style-type: none"> <li>○ For pages based on forms, web services, or built with EMC Documentum: <ul style="list-style-type: none"> <li>• Response time under 30 seconds on average</li> <li>• Response time 90% under 50 seconds on average</li> </ul> </li> </ul>
Document Upload	<ul style="list-style-type: none"> <li>○ Upload valid picture file type (about 2.92MB size) response time under 30 seconds on average</li> <li>○ Upload valid picture file type (about 2.92MB size) response time 90% under 50 seconds on average</li> <li>○ All defects of priority 1 and 2 have been resolved</li> </ul>

The transactions called out in the audit report fit into the above highlighted 3 different classifications and hence their exit criteria for each of them have different response times as well.

In summary, MyCity applications are complex applications that has multiple integrations with other applications hosted on the cloud platform. The OTI QA team has found that the MyCity applications performance is deemed to be satisfactory. It will be continued to be tested and monitored for future releases to maintain the OTI performance test standards.





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