

**Testimony of Commissioner Vilda Vera Mayuga
New York City Department of Consumer and Worker Protection**

**Before the Committee on
Consumer and Worker Protection**

Hearing on Fiscal Year 2026 Preliminary Budget

March 19, 2025

Introduction

Good afternoon, Chair Menin and members of the Committee on Consumer and Worker Protection. I am Vilda Vera Mayuga, Commissioner of the Department of Consumer and Worker Protection (DCWP), and I am joined by First Deputy Commissioner, Kenny Minaya, General Counsel, Michael Tiger, and Assistant Commissioner for External Affairs, Carlos Ortiz. Thank you for the opportunity to be here today before this committee, to testify on the work of our agency and its budget for Fiscal Year 2026.

DCWP is a key resource for all New Yorkers. Our agency provides fundamental consumer and worker protections, and financial empowerment programming across the five boroughs. We are dedicated to ensuring that consumers who have been exploited or deceived have a route to financial recourse, that workers have a passionate defender of their rights and that all New Yorkers have the tools and support needed to better their financial health.

Our agency's efforts directly impact the lives of New Yorkers, and I am proud of the work we accomplish every day for our city. Under my tenure, we have helped deliver more than \$1.3 billion back to New Yorkers through debt relief, restitution, and financial empowerment programming. I'd like to thank all of you for your consistent support and advocacy of our agency's work. Today, I am happy to speak to you about our successes in the last year, as well as how we plan to continue and expand on that success. Before I do, let me provide the committee with some important background information on the agency.

DCWP's Budget

For Fiscal Year 2026, DCWP's preliminary budget is approximately \$75 million, with an authorized headcount of 475 and an active headcount of 399. We license more than 45,000 businesses in more than 40 different industries. And, last year our team conducted more than 54,000 inspections and completed over 1,100 investigations on behalf of consumers and workers, securing just over \$13 million in monetary relief for New Yorkers. Our Financial Empowerment Centers were visited by more than 11,000 clients, and NYC Free Tax Prep completed more than 100,000 tax returns for New Yorkers.

Uplifting and Securing Justice for Workers

DCWP serves as the City's central resource for workers in New York City, and a dedicated voice in City government for the issues workers face. DCWP enforces key municipal workplace laws

that provide workers with greater stability in their schedules, income, and jobs. We strive to ensure compliance with these essential workplace laws and secure restitution for workers who have faced violations in the workplace. These consistent efforts led to our agency securing nearly \$8 million in restitution for workers across the city in 2024. This includes our enforcement of the Paid Safe and Sick Leave Law, our cornerstone workplace law, which recently celebrated its ten-year anniversary, and the Fair Workweek law.

We are always looking for new ways to protect and promote labor standards and policies that create fair workplaces for those in our city. 2024 was the first full year that delivery workers earned a dignified pay, and the impacts are astounding, with wages earned increasing by \$700 million collectively. In just a couple of weeks, the MPR will increase to \$21.44 to reflect an inflation adjustment, so that those who work so hard to keep us fed are able to care for themselves and their families. I'd like to also thank Councilmembers Nurse and Gutierrez for their proposals to expand the minimum pay rate to more of our city's delivery workers with their legislations, Introductions 1133 and 1135. We are ready and excited to implement this expansion once the legislation has been passed.

Lastly, we always pair our enforcement work with education. To that end, we hit the ground running last year after bringing back an updated version of our popular Workers' Bill of Rights booklet. This small booklet is a huge resource for workers, providing them with an overview of integral City, State and Federal workplace laws, as well as the agency to contact should anyone experience a violation of these laws. To increase knowledge of this and our agency's other resources, our team worked to meet New Yorkers where they are, conducting nearly 300 worker outreach events, reaching about 33,000 New Yorkers, last year. This includes our Day of Action, where my team and I visited major commuter terminals across the five boroughs to pass out materials to more than 10,000 New Yorkers in one day.

Protecting Consumers by Holding Bad Actors Accountable

Since our landmark Consumer Protection Law was enacted in 1969, we have been the nation's leading municipal consumer protection agency. For nearly sixty years now we have consistently used our authority to protect New Yorkers from deceptive business practices, securing financial restitution for consumers whose rights have been violated by bad actors in the marketplace. Last year, our agency issued nearly 19,000 summonses for violations of our laws and returned \$5 million to consumers through restitution and disbursements.

When we were here last year, we had just implemented new rules for consumers that had been taken advantage of by Home Improvement Contractors (HIC). These new rules simplified the process for consumers to receive compensation from the HIC trust fund. In 2024, we approved nearly 140 claims, distributing nearly \$1.2 million to consumers. Our consumer protection team worked diligently this past year to hold deceptive and predatory businesses accountable for their actions. Last year, our case against R.G. Ortiz Funeral Homes brought aggrieved families more than \$600,000 in restitution. Our team also took action against the exploitative moving company, Dorm2Dorm, securing more than \$3.75 million in penalties and restitution. While our efforts serve to make harmed consumers whole, they also send a message that we can and will take action against businesses that prey upon New Yorkers. Altogether, our consumer protection

team's efforts have played a major role in the recovery of about \$25 million in financial restitution and debt relief for consumers under my tenure.

We are dedicated to providing protections to New Yorkers while working to facilitate compliance amongst businesses with the laws that we enforce. Along with our consistent business outreach and education events, our Visiting Inspector Program, or VIP, provides new licensees the opportunity to receive an educational visit from one of our inspectors. Last year, we opened up VIP to all brick-and-mortar retail businesses that are required to be in compliance with our laws, regardless of whether they are required to obtain a DCWP license.

Helping New Yorkers Reach Their Financial Goals

In addition to providing key consumer and worker protections, our agency also provides vital financial empowerment resources to support individuals and help households improve their financial health. This year, we are celebrating ten years of the City's dedicated investment in our New York City Free Tax Prep program. This program offers city residents access to free, professional tax preparation support and filing. Our tax preparers are trained to help New Yorkers maximize their tax refunds by optimizing the use of various tax credits. This program also includes our NYC Free Tax Prep for self-employed individuals, offering specialized support for freelancers, gig workers, small business owners, and other self-employed New Yorkers filing their taxes. Last year, our Coalition helped file more than 100,000 tax returns through NYC Free Tax Prep, saving clients \$56.5 million in fees and helping secure more than an estimated \$450 million in refunds for New Yorkers under my tenure.

Our NYC Financial Empowerment Centers provide opportunities for New Yorkers to meet with trained counselors for one-on-one, confidential financial counseling at no cost. These counselors support individuals in reaching financial goals by establishing budgets, creating spending plans, opening safe and affordable bank accounts, and navigating loan repayment, including student loan debt. We are especially looking forward to expanding our Financial Empowerment Centers to several NYC Health + Hospitals locations this year. Last year, we had almost 12,000 clients visit our Centers, 9,000 of whom were first-time clients. As of the start of this year, our professional counselors have helped New Yorkers increase their savings by about \$16 million and reduce their debt by over \$120 million since the opening of our Centers. This is just one of the many ways that our agency delivers for the working people of New York.

Continuing to Serve New Yorkers

As you all know, while we are one of the smaller agencies, we are proud to have a rather large mandate to provide protections to every person that lives, works, or visits in our great city. Along those lines, we are excited to broaden our work again this year, bringing consumers and workers expanded protections through our licensing of hotels, thanks to Chair Menin's Safe Hotels Act. The hotel industry is and always will be incredibly important to the success of New York City, contributing \$74 billion to our local economy, serving millions of consumers, and employing tens of thousands of workers. DCWP, joining other major cities across the country, will enforce key protections for consumers and workers in hotels, and help hotels build a culture of compliance with our laws and rules.

Starting in June, we will also start enforcing the ban on forced broker fees for tenants across the five boroughs, thanks to Councilmember Osse's FARE Act. Our broker fee ban will join the list of our various consumer and worker protections that help New Yorkers keep more of their hard-earned money. We look forward to partnering with the Council on outreach and education measures to support implementation.

We will also be taking on two additional initiatives, announced earlier this year. First, together with the Department of Citywide Administrative Services (DCAS), we will launch a program for 300,000 New York City employees and their families to help them manage their student loans. This includes assistance enrolling in the Public Service Loan Forgiveness program, aiming to eliminate more than \$360 million in student loan debt.

Secondly, something I have been so passionate about bringing to the forefront is our new youth financial empowerment initiative with New York City Public Schools. I have spoken here before about the impact that our agency's financial education and counseling had on me as an adult. However, a resounding theme of our November public hearing on financial empowerment was that the foundations of financial health and success really begin in childhood. By collaborating with NYC Public Schools, our initiative will build financially savvy New Yorkers by providing meaningful financial empowerment programming to address the needs of youth and their families both in and outside of school environments. We are so proud of this program and are excited to roll out services that will help a new generation of New Yorkers.

Conclusion

I'd like to thank you again for the opportunity to present on our agency's work for our city and residents. We are looking forward to this upcoming fiscal year, continuing and expanding on our commitment to provide core protections and resources to New Yorkers. We remain resolute in our mission to uplift New Yorkers, protecting and enhancing their daily economic lives, and we thank you for your advocacy and support in our mission and work.

As a final note, I would like to take the opportunity to express my appreciation for my team, that works so diligently each and every day for the people of our city. It is with their dedication and passion as public servants that we are consistently able to deliver for New Yorkers. Thank you. I look forward to answering your questions.



Our Mission and Purpose

The **NYC Department of Consumer and Worker Protection (DCWP)** protects and enhances the daily economic lives of New Yorkers to create thriving communities.

If you *shop* at a business, *work* at a business, or *own* a business, DCWP touches your life.

Our Commitment to Consumers

DCWP enforces consumer protection and licensing laws to protect you in the marketplace.

We also offer free programs to help you do more with your money.

Visit nyc.gov/dcwp or call **311** to:

- Get tips
- Check if a business is licensed
- File a complaint
- Get free financial counseling
- Get free tax preparation

You do not have to give your name or your immigration status to make a complaint. However, if you want DCWP to contact you, you must provide your name and address.



NYC Financial Empowerment Centers offer free one-on-one professional financial counseling in person or by phone. Counselors speak multiple languages. Services are secure and confidential.

*You must be at least 18 and live or work in NYC.
Income and immigration status do not matter.*



Book an appointment:
nyc.gov/TalkMoney | **311**



You may qualify for **NYC Free Tax Prep** services, which include online filing and in-person filing. Some sites can help you with Individual Taxpayer Identification Number (ITIN), prior-year returns, or quarterly tax filings if you're self-employed.



For more information about services and ITIN:
nyc.gov/taxprep | **311**

Our Commitment to Workers

If you work in NYC, you have rights regardless of your immigration status. Rights enforced by DCWP include:

- Paid safe and sick leave
- Temporary schedule changes
- Predictable schedules
(if you work in fast food or retail)
- Minimum pay and more protections for restaurant delivery workers
(if you work for an app)

If an employer or app violates the law, workers may be owed money.

We offer free mediation and navigation programs:

- **Domestic Worker Mediation Program**
Helps domestic workers and household employers resolve issues without going to court.
- **Navigation Program**
Helps freelance workers who have not been paid.

For more information or to file a complaint:
nyc.gov/workers | 311

Workers' Bill of Rights:



Our Commitment to Businesses

DCWP licenses more than 45,000 businesses in more than 40 industries. We offer convenient online services and free resources to help businesses comply with the law.

Using DCWP online services, account holders can:

- Apply for and renew licenses
- Review and update license information
- View past inspections
- Schedule certain scale and fuel inspections
- Pay fines and fees
- View complaints submitted against your business
- And more!

Visit nyc.gov/dcwp to learn more.



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Manny Pastreich, *Chairman*
Howard I. Rothschild, *Secretary*
Peter Goldberger, *Executive Director*
Cora Opsahl, *Fund Director*

Testimony of Misha Sharp, Assistant Director of Policy, 32BJ Health Fund New York City Council Hearing, FY26 Preliminary Budget Hearing, Committee on Consumer and Worker Protection 3/19/25

Introduction

My name is Misha Sharp, and I am the Assistant Director of the 32BJ Health Fund, a large self-funded health plan that provides health care benefits to over 200,000 32BJ SEIU union members and their families using contributions from over 5,000 employers. Those union members are the front-line building services workers that keep our buildings in order and our airports and schools running. We are one of the largest self-insured funds in New York State.

The cost of participants' healthcare is paid using funds secured through the union's contracts with their employers. All medical claims are paid by the 32BJ Health Fund. Our Fund has no profits, no shareholders, and no financial interests other than providing our participants with high-quality, affordable healthcare. While the Fund uses a third-party administrator to manage our benefits, the cost of care provided to plan participants is paid entirely by the Health Fund using employer contributions. That means as healthcare costs go up, those costs are passed on directly to our Fund.

Unless otherwise cited, all data provided in this testimony are from 32BJ Health Fund claims data analyses.

Why Hospital Prices Matter

Every dollar spent on higher-priced care is a dollar that can't be used for wage increases or other benefits like pension. Since 2004, the cost of health benefits for our participants has increased from 17 percent of the total employee compensation package to 37 percent. Put another way, healthcare costs have risen four times that of wages: with a 54% increase in wages and a 230% increase in health benefit costs. While many factors drive the rising cost of healthcare, our data -- and that of others -- consistently points to one overwhelming contributor: rising hospital prices. No other factor has a greater impact on healthcare costs. Our Health Fund spends about \$1.5 billion on healthcare each year, and over half of that spending is on hospital care. The Health Fund spends more annually on health services from just the five largest academic medical centers in New York City than is paid in pension benefits each year by the 32BJ Pension Fund for members throughout the country.

According to the U.S. Bureau of Labor Statistics, the inflation rate for hospitals prices has risen over 100% since 2009.¹ This compares to increases of about 50% for prescription drugs, housing, and food.² Data from the most recent hospital price transparency studies show that commercial purchasers in New York State paid 310% of Medicare for hospital services on average in 2022, while the national average was 250% of Medicare.³ Though some will argue that Medicare rates do not sufficiently cover the cost of care, the extent of these markups don't add up. The Greater New York Hospital Association has cited that Medicaid covers about 70%

¹ U.S. Bureau of Labor Statistics, Consumer Price Index. <https://www.bls.gov/charts/consumer-price-index/consumer-price-index-by-category.htm>

² Id.

³ RAND Hospital Price Transparency Study 5: <https://www.rand.org/health-care/projects/hospital-pricing/round5.html>

of hospitals' costs to provide care, while Medicare covers 85%.⁴ Based on these figures and the commercial payer mix at New York hospitals, we estimate that commercial payments at 130% of Medicare would cover this cited shortfall.

The hospital prices that 32BJ Health Fund pays in New York City have risen from 215% of Medicare in 2016 to 250% of Medicare in 2023. These amounts are substantial but would have been markedly higher without the difficult decision to remove a high-priced hospital system from our network in 2022. If the Fund paid the same rates that Medicare does for hospital services from 2016 to 2019, it could have saved \$1.1 billion.⁵ In recent years, spending increases are being driven by the *hospital outpatient sector*. In 2019, we spent roughly equivalent amounts on hospital inpatient and outpatient services. But from 2019-2023, our hospital inpatient spending decreased by 6% while hospital outpatient spending increased by 25%. From 2016-2023, our inpatient prices relative to Medicare increased from 186% to 209% on average, while outpatient prices increased from 296% to 342% of Medicare.

New York City's workers and employers need to be able to have a clear line of sight into hospital prices to understand which hospitals and what services are driving our health benefit costs. We know safety net hospitals like NYC Health & Hospitals do not contribute to this problem but the same cannot be said of the other major systems in New York City. Solutions should be targeted to the most expensive systems or where the most impact can be obtained.

New York City's Budget & The Office of Healthcare Accountability

Public budgets and public employee health plans like New York City's are experiencing the same phenomenon as we are when it comes to high healthcare costs driven by rising hospital prices. This is why it is critical for the City Council to support the strong implementation of the nation's first municipal Office of Healthcare Affordability ("The Office" or "OHA"). The Office can provide one centralized entity that collects and disseminates critical information on healthcare cost drivers and hospital prices. This information could be a gamechanger for purchasers like us because it bolsters the evidence base we can use when creating market-driven solutions to lower healthcare costs for our members.

We hope to receive the first annual OHA report on New York City hospital pricing and finances later this month. As required in the statute, it is particularly important that the report provide negotiated hospital inpatient and outpatient prices by procedure and by hospital for the City's public employee health plan – and that those prices are accompanied by a benchmark to Medicare prices so that we have a consistent point of comparison. Medicare calculates its payments based on provider-attested costs and includes an extensive stakeholder review process. Medicare also adjusts for case mix, severity, and other operational factors. Identifying hospital facilities and services that have high commercial prices relative to Medicare helps us understand where price markups may occur that have more to do with a hospital's market power than the underlying cost of providing care.

The New York State public employee health plan recently completed an analysis of its hospital spending and prices that shows the utility of this information for policymakers and purchasers. According to data provided by the New York State Health Insurance Plan (NYSHIP), which provides health benefits for 1.2 million State employees, retirees, and dependents, hospitals accounted for 41% of total healthcare spending in 2021.⁶ This is

⁴ Greater New York Hospital Association Testimony for SFY 2025-26 Joint Legislative Budget Hearing – Health. February 11, 2025: <https://www.nysenate.gov/sites/default/files/admin/structure/media/manage/filefile/a/2025-02/gnyha-budget-documents.pdf>

⁵ 32BJ Health Fund. (Revised November 1, 2022.) Hospital Prices: Unsustainable and Unjustifiable.

⁶ Letter from Department of Civil Service to Senator Gounardes and Assemblywoman Cruz dated January 30, 2023

slightly higher than the New York State average of 39%.⁷ In 2022 and 2023, NYSHIP reported spending about \$4 billion on hospital care each year.⁸ Over half of that spending, or \$2.2 billion, went to eight large hospital systems downstate.⁹ Nearly \$1.4 billion was spent on only three large hospital systems: Northwell, NYU Langone, and New York Presbyterian.¹⁰ From 2022 to 2023, NYSHIP saw negligible changes in hospital inpatient spending, but a nearly 10% increase in hospital outpatient spending, such that spending on outpatient services nearly equaled spending on inpatient services.¹¹ While this is helpful information pointing to key healthcare cost drivers for the plan, the report unfortunately did not benchmark commercial prices against the prices Medicare pays for the same services at the same facilities.

We know that the value of the OHA is only as good as the data it has access to, and the data it can make available to the public. And we know that there are many industry players who prefer that this information stay hidden. We encourage the City Council to engage critically with the inaugural report findings and to advocate for the release of all hospital pricing and financial information required under Local Law 78. If certain information is missing from the OHA report – the City Council should be asking why.

What New York Can Do to Mitigate Rising Hospital Prices: The Fair Pricing Act (S.705/A.2140)

High and rising hospital prices matter for everyone in New York who has to balance a budget. New York’s per capita spending on hospital care is higher and growing faster than the national average.¹² This is due to high hospital prices, rather than increasing utilization. For too long, purchasers, policymakers, and patients have been expected to shoulder the burden of unjustifiable hospital price increases. New York State needs to act immediately to lower commercial hospital prices and to slow those price increases over time.

One way to do this is to mitigate the incentives for large hospital systems to acquire independent physician practices, which drives up healthcare prices. After hospital systems acquire a physician practice, they charge higher prices for low-complexity services that have typically been provided in those offices, like imaging (X-rays, MRIs, and CT scans), drug administration, and preventive care visits. When physician practices are acquired by hospitals, their prices increase by an average of 14%.¹³ A new study from Brown University using New York State commercial claims data shows that hospital outpatient department prices are four times higher than doctor’s office prices for these low complexity services, on average.¹⁴ As an example, claims data from 32BJ Health Fund shows an average aggregate price of \$23 for flu shot administration in the doctor’s office compared to \$183 in the hospital outpatient department.

The Fair Pricing Act (S.705/A.2140), sponsored by New York State Senator Liz Krueger and Assemblymember Chantel Jackson, would make New York the first state in the nation to ensure that the same procedure costs the same price no matter what setting the care is provided in. This is similar to enacted and proposed “site neutral

⁷ Appendix Table e9c in: Emily K. Johnson et al., “Varied Health Spending Growth Across US States Was Associated With Incomes, Price Levels, And Medicaid Expansion, 2000–19,” *Health Affairs*, 41(8): 1088–1097, <https://doi.org/10.1377/hlthaff.2021.01834>

⁸ New York State Department of Civil Service. *Empire Plan Hospital Pricing: Annual Report Years 2022 & 2023*. Accessed January 27, 2025. <https://www.cs.ny.gov/extdocs/pdf/2024%20Hospital%20Transparency%20Report.pdf>

⁹ Id.

¹⁰ Id.

¹¹ Id.

¹² Hammond, B. (March 30, 2023). *New York’s Hospital Profits Surged in 2021*. Empire Center. <https://www.empirecenter.org/publications/new-yorks-hospital-profits-2021/>

¹³ Capps, C., Dranove, D., and Ody, C. (May 2018). The effect of hospital acquisitions of physician practices on prices and spending. *Journal of Health Economics*, 59:139-152. <https://doi.org/10.1016/j.jhealeco.2018.04.001>.

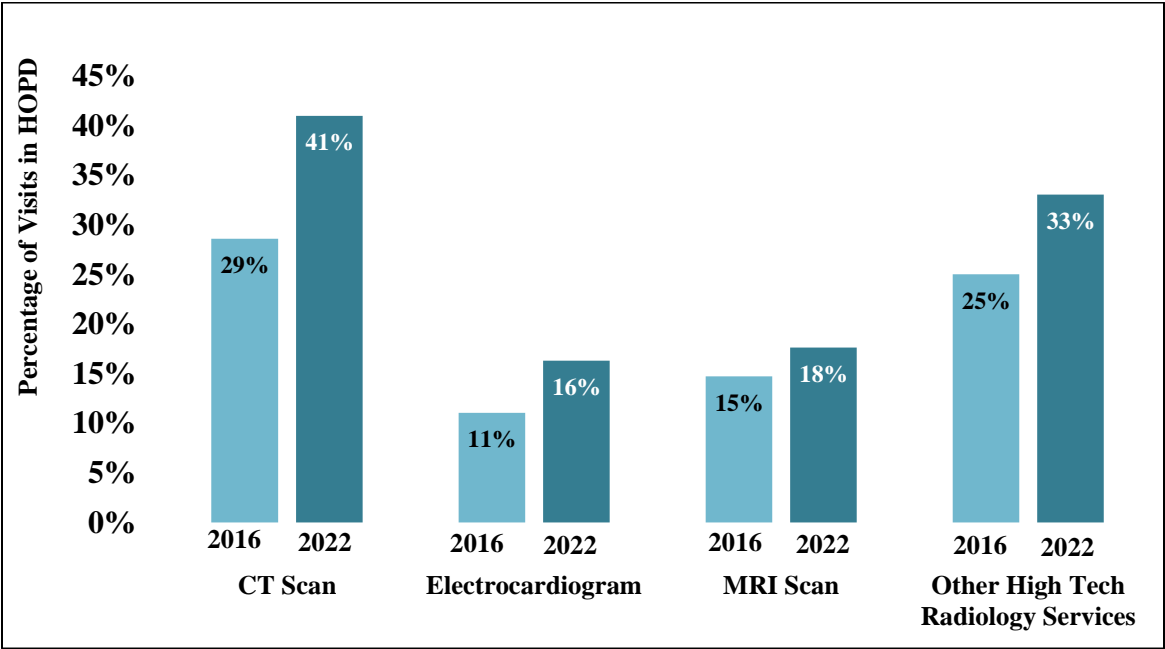
¹⁴ Murray, R., Janjua, H., and Whaley, C. (February 11, 2025) *Estimating Savings from the Fair Pricing Act and Commercial Site-Neutral Payments in New York State*. Brown University Center for Advancing Health Policy through Research.

payment” policies under the Medicare program. The proposal would do this by capping prices for certain routine, low-complexity services at prices comparable to those in doctor’s offices, regardless of who owns the building.

The Fair Pricing Act would require hospitals to offer a contract for specific, routine services – already determined by the Medicare Payment Advisory Commission (MedPAC) – with prices capped at a certain percentage of Medicare. Providers would not be allowed to charge, bill, or accept payments above the cap. The bill would also explicitly prohibit facility fees for these services. Safety net hospitals, public hospitals, federally qualified health centers, critical access hospitals, sole community hospitals, and rural emergency hospitals are all exempt from the legislation. State-regulated payers would also be prohibited from entering into contracts that provide reimbursement rates in excess of the cap, and would not be allowed to hold participants responsible for amounts above that cap.

32BJ Health Fund has observed that certain basic services, like flu shots, x-rays, or MRIs, have shifted from the historical norm of being provided in a doctor’s office to being provided in hospital outpatient departments. For example, in 2016, 71% of non-emergency CT scans for our participants in New York occurred in a doctor’s office, with 29% in a hospital outpatient department. By 2022, nearly 41% of CT scans were occurring in a hospital outpatient department (see Figure 1). There is no apparent clinical reason for this shift. This is particularly worrisome because the average hospital outpatient department price for a CT scan in our data is almost double that of a CT scan provided in a doctor’s office. If non-emergency CT scans in New York hospital outpatient departments cost the same as those in the doctor’s office, our Fund could have saved over \$500,000 in 2022.

Figure 1: 32BJ Health Fund Claims Illustrate That Basic Procedures are Shifting to Hospital Outpatient Departments (HOPD) (from 2016 to 2022)



The Fair Pricing Act would create greater healthcare affordability and tangible savings for purchasers like 32BJ Health Fund, for New York City, and for patient out-of-pocket costs. According to 32BJ Health Fund’s analysis of its claims, the Fund could have saved \$31 million, or 2% of overall health benefit spend, in 2022 if this type

of policy were in place.¹⁵ We expect other self-funded plans in the state to see similar savings. A study of commercial claims data from health economists at Brown University shows large annual savings of over \$120 million could be achieved for the New York City public employee and retiree health plan.¹⁶ Overall, the study found that New York could see \$1.1 billion in savings per year from this proposal. One important aspect to understand is that when treatment is rendered in a hospital outpatient department rather than a doctor's office, patients often have much higher out-of-pocket costs. This is because hospital care typically includes a deductible and higher coinsurance. The Brown University study estimates up to \$213 million in savings going directly back into New Yorkers' pockets through lowered out-of-pocket costs.¹⁷

Setting a cap on prices at a percentage of Medicare rates ensures a limit on the current arbitrary nature of prices in the commercial market. Medicare rates are set to reflect the cost of care for services and are based on extensive expert review. A rate cap at 150% of Medicare is above the level at which doctors' offices are currently providing these services in New York, which is 130% of Medicare on average.¹⁸

Though you will hear about hospitals being underfunded by public payers, which is true for many safety net and public hospitals, there is also another side of our healthcare system that has an enormous impact on healthcare affordability for patients in New York. This side is represented by the high-priced hospital systems that yield large market share and large profits in the current market. For example, New York Presbyterian Hospital generally maintained operating profit margins above 15% from 2012 to 2022, Northwell Lenox Hill Hospital had operating profit margins between 8% and 26%, and the Hospital for Special Surgery had consistently positive operating profit margins between 12% and 25% during this timeframe.¹⁹ This is based on Medicare Cost Reports which are certified and submitted by the hospitals themselves.

Safety net and public hospitals are exempt from the Fair Pricing Act because these are not the hospitals charging New Yorkers high prices. We cannot let fear of the problems faced by struggling safety net or public hospitals prevent commonsense action to rein in the highest prices that leave our healthcare market vulnerable to profit-seeking behavior.

When hospitals raise prices on routine medical care provided in hospital outpatient departments that is safe to provide at a doctor's office, the added costs are shouldered by patients, families, workers, and employers. We can make healthcare pricing for routine services fairer and more affordable for all New Yorkers, without compromising access or quality of care.

¹⁵ 32BJ Labor Industry Cooperation Fund. The Need for Fair Hospital Pricing in New York. Published September 2024. <https://32bjhealthinsights.org/resources/#32BJHealthFund>

¹⁶ Murray, R., Janjua, H., and Whaley, C. (February 11, 2025) Estimating Savings from the Fair Pricing Act and Commercial Site-Neutral Payments in New York State. Brown University Center for Advancing Health Policy through Research.

¹⁷ Id.

¹⁸ Id.

¹⁹ Hospital Cost Tool published by the National Academy for State Health Policy. Accessed February 3, 2025. <https://tool.nashp.org/>

**TESTIMONY IN SUPPORT OF RENEWING AND EXPANDING THE LOW-WAGE
WORKER SUPPORT INITIATIVE FOR FY26**

*Testimony from David Colodny, Managing Attorney for the Workers' Rights Program, Catholic
Migration Services*

Before the New York City Council Committee on Consumer and Worker Protection
March 19, 2025

Good afternoon Chair Menin and members of the Committee on Consumer and Worker Protection. I appreciate the opportunity to testify in support of the renewal and expansion of the Low Wage Worker Support Initiative.

My name is David Colodny. I am the Managing Attorney for the Workers' Rights Program at Catholic Migration Services. With offices in downtown Brooklyn and Sunnyside, Queens, Catholic Migration Services provides free legal services in the areas of immigration, tenants' rights, and workers' rights. I submit this testimony on behalf of both Catholic Migration Services and the Citywide Immigrant Legal Empowerment Collaborative (CILEC) in support of the renewal and expansion of the Low Wage Worker Support Initiative funding, the only dedicated city funding for employment related legal services to assist low wage and immigrant workers.

Catholic Migration Services is a member organization of CILEC, a collaborative of several legal services providers and community-based organizations that provide high quality legal services, community outreach, and case management to low income and immigrant workers. The need for services from CILEC's member organizations unfortunately remains very robust as employers in New York City continue to exploit workers, and particularly immigrant workers.

When low-income workers have their wages stolen, face discrimination at work, are denied paid sick pay, suffer workplace injuries or struggle to collect unemployment insurance benefits, they turn to trusted community-based and legal services organizations for help, as many cannot access or afford legal representation from attorneys in private practice. Funding for these services supports the economic stability of some of the most vulnerable residents of this city.

By way of example, I would like to share the stories of some clients to illustrate the working conditions that low wage workers face, and how Catholic Migration Services was able to assist these workers with funding from the Low Wage Worker Support Initiative:

- Dim Sum Restaurant. Our office recently represented five workers employed by a couple of midtown Manhattan dim sum restaurants. Our clients worked twelve-hour shifts, five or six days per week, and received wages ranging between approximately \$3.20 and \$6.52 per hour. CMS filed a case in the federal district court in Manhattan

and ultimately won a settlement through which our clients received more than \$185,000.

- Brooklyn Bagel Shop. We recently represented two workers who worked as much as 68 hours per week at a Brooklyn Bagel without receiving minimum wage or overtime pay. We filed a case in the federal district court in Brooklyn and won a settlement of \$165,000 for our clients.
- We also represent many domestic workers, for whom it is common not to receive overtime pay despite routinely working more than 40 hours per week. As an example, we currently use the Low Wage Worker Support funding to represent a Brooklyn resident who typically worked between 55 and 60 hours per week for her Long Island-based employers. Not only did she not receive overtime, she was paid less than the minimum wage. When she asked her employer to be paid the minimum wage, she was immediately fired in violation of the NY Labor Law's anti-retaliation provision. We currently represent this worker at the New York State Department of Labor and hope to recover the wages she is owed, as well as penalties for the unlawful retaliation.

These are just examples of the terrible working conditions that low-wage workers often face in New York City.

I would also like to share an example of a case that highlights the important role that worker centers play, and how legal services organizations and government enforcement agencies can collaborate with the support of city funding. A couple years ago, several workers who were employed by a cleaning contractor at Rikers went to one of the CILEC member organizations for assistance, New Immigrant Community Empowerment (NICE). NICE in turn connected those workers with our office. Not only were they not receiving the required wages and sick leave, their supervisors were engaged in an illegal kickback scheme and required the workers to return a portion of their wages to the supervisors with every paycheck – typically \$100 - \$200 per week, but sometimes more. CMS advocated to the New York State Attorney General's office and asked it to undertake a criminal investigation, which it did. As a result, the Attorney General's office reached a settlement with the employer that will result in **\$1.029 million being distributed to approximately 250 workers**. This would not have been possible without funding support from New York City. The Attorney General's press release is available at <https://ag.ny.gov/press-release/2025/attorney-general-james-recovers-11-million-rikers-island-cleaners-cheated-out>.

It also cannot go unmentioned that the City's immigrant workers now work in an environment where **employers may feel emboldened by federal immigration policies to retaliate against complaining workers** by reporting them to the Department of Homeland Security, or at least threatening to do so in an effort to suppress worker voices. These workers who have the courage to stand up for their rights deserve to have legal counsel to assist them in vindicating their workplace rights, and to protect them from illegal retaliation. We desperately need the Low Wage Worker Support funding to do so.

Finally, we respectfully request that the Council not only renew funding, but increase the funding from its current level of \$2 million in FY25 to \$3 million in FY26. Every one of these dollars results in multiple dollars ultimately going into the pockets of hard working New Yorkers whose rights had been violated. The private enforcement of these laws also deters other employers from violating the law.

Thank you for the opportunity to testify today, and for your consideration of our request to expand funding for the Low Wage Worker Support Initiative.

David Colodny
Managing Attorney, Workers' Rights Program
Catholic Migration Services
47-01 Queens Blvd., Suite 203
Sunnyside, NY 11104
dcolodny@catholicmigration.org



**Center for
Family Life
in Sunset Park**

TESTIMONY

Wednesday, March 19, 2025

Preliminary Budget Hearing for Fiscal Year 2026:
“New York City’s Worker Cooperative Business Development Initiative:
Worker Cooperatives to Fight Economic Inequality in NYC”

PRESENTED TO

New York City Council, Committee on Consumer and Worker Protection
Hon. Julie Menin, Chair

Members: Shaun Abreu, Gale A. Brewer, Amanda Farias, Shekar Krishnan, Chi A. Ossé and Julie Won

PREPARED BY

Ofelia Salgado
Business Developer, Cooperative Development Program
Center for Family Life in Sunset Park

**New York City’s Worker Cooperative Business Development Initiative
Center for Family Life**

443 39th St., Brooklyn, NY 11232

Phone: 718-633-4823



Center for Family Life in Sunset Park

Good afternoon, Chair Julie Menin and distinguished members of the New York City Council Committee on Consumer and Worker Protection.

My name is Ofelia Salgado, and I am a business developer at the Cooperative Development Program at the Center for Family Life in Sunset Park (CFL), a 47-year-old social service organization dedicated to providing vital resources to low-income families in Brooklyn, helping them to thrive and build sustainable futures.

I am here today to respectfully request that the New York City Council continue to support the Worker Cooperative Business Development Initiative (WCBDI) by allocating \$5.1 million for fiscal year 2026.

Since 2014, CFL has been a proud participant in WCBDI, an initiative funded by the Council that enables organizations like ours to incubate and nurture worker-owned businesses. Through this invaluable support, CFL has successfully incubated 27 cooperative businesses in the domestic work industry, empowering over 600 immigrant women with a transformative opportunity to take control of their economic and professional lives.

Each year, through our Cooperative Development Program, 420 participants benefit from training and information sessions on worker-owned cooperatives, business management, and community leadership. These sessions are designed to equip individuals with the skills and confidence needed to manage their own businesses. At CFL, we firmly believe that with the right resources, anyone—regardless of socio-economic status—can become a successful entrepreneur. The Council's support also allows us to provide 273 business management consulting services annually to operating cooperatives, ensuring their stability and growth. Importantly, all our services are offered in the languages spoken by our participants, breaking down language barriers and enhancing accessibility within immigrant communities.

Your continued support has enabled CFL to innovate and scale our initiatives, broadening the reach of the cooperative business model to other low-income communities across New York City. One of our proudest achievements is the creation of Up & Go, an online marketplace where clients can book and pay for residential and commercial cleaning services from worker-owned cooperatives. Since its launch in 2017, Up & Go has generated over \$3 million in sales, directly benefiting 100 families in our community. The average income for cooperative members through Up & Go is \$33 per hour—more than double the average wage of \$16 per hour for domestic workers outside of the cooperative model. Additionally, Up & Go's cooperative infrastructure has completely eliminated wage theft, providing a safe and equitable work environment for all its members.

These accomplishments would not have been possible without the steadfast support of the New York City Council. Continued investment in worker-owned cooperative businesses through the Worker Cooperative Business Development Initiative is critical to combating economic inequality and fostering resilient communities throughout our city.

On behalf of the Center for Family Life, I thank you for your time, consideration, and unwavering commitment to economic equity. We look forward to your continued support in fiscal year 2026 and beyond.

Thank you.



TESTIMONY ON: Department of Consumer and Worker Protection Budget

PRESENTED BEFORE: The New York City Council Committee on Consumer and Worker Protection

PRESENTED BY: Jorge Rosero, Associate Director for Asset Building, jorge@chhayacdc.org

March 19, 2025

Good afternoon, I am Jorge Rosero. I am the Associate Director for Asset Building at Chhaya CDC. For 25 years, Chhaya has built equitable and thriving neighborhoods by fostering the self-determination, housing stability, and economic well-being of South Asian and Indo-Caribbean communities across New York City. We provide housing, tax, small business and financial counseling to thousands of New Yorkers a year serving some of the most vulnerable low-income communities in Queens.

Chhaya's financial counseling services have been a transformative force in the South Asian communities of Queens, NY, providing individuals and families with the tools they need to achieve financial security and long-term economic stability. Through personalized guidance, we help clients reduce debt, establish and build credit, set financial goals, and develop savings plans tailored to their unique needs. Our services also empower community members to open safe and affordable bank accounts, ensuring they have access to secure financial resources that support their journey toward greater financial independence. By addressing key financial challenges and equipping clients with the knowledge and strategies to make informed decisions, we are fostering a culture of financial empowerment and resilience in our community.

This critical work has been made possible through the generous support of the NYC Department of Consumer and Worker Protection (NYDCWP), whose funding has enabled us to expand our reach and impact. With their support, we have been able to serve countless families who may have otherwise struggled to navigate complex financial systems. The impact of our work goes beyond individual financial success—it strengthens the economic fabric of the entire community by promoting financial literacy, stability, and growth. As we continue to provide these vital services, we remain committed to ensuring that every member of our community

has the opportunity to build a strong financial foundation and work toward a brighter, more secure future.

Chhaya CDC - Testimony 03-2025

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Chinese-American Planning Council, Inc.
Testimony at the New York City Council Consumer and Worker Protections Committee
Honorable Julie Menin, Chair
March 5th, 2025

Thank you Chair Menin and the Members of the City Council for the opportunity to testify today. The mission of the Chinese-American Planning Council, Inc. (CPC) is to promote social and economic empowerment of Chinese American, immigrant, and low-income communities. CPC was founded in 1965 as a grassroots, community-based organization in response to the end of the Chinese Exclusion years and the passing of the Immigration Reform Act of 1965. Our services have expanded since our founding to include three key program areas: education, family support, and community and economic empowerment.

CPC is the largest Asian American social service organization in the U.S., providing vital resources to more than 80,000 people per year through more than 50 programs at over 30 sites across Manhattan, Brooklyn, and Queens. CPC employs over 700 staff whose comprehensive services are linguistically accessible, culturally sensitive, and highly effective in reaching low-income and immigrant individuals and families. With the firm belief that social service can incite social change, CPC strives to empower our constituents as agents of social justice, with the overarching goal of advancing and transforming communities.

We strongly urge the allocation of \$77 million for the Department of Consumer and Worker Protection (DCWP) in FY26 to ensure robust enforcement of worker protections. We are requesting \$2 million more in additional funding over the proposed amount in the preliminary budget. We are requesting that the \$2 million allocation be used to hire seven attorneys, five data scientists, four investigators, and one outreach person.

In light of the current federal administration's ongoing assault on worker protections, our city has become the first line of defense against harmful policies. The Trump Administration's unlawful and unprecedented attacks on workers and the agencies designed to protect them have made state and local enforcement more critical than ever before.

Soon after taking office, President Trump dismissed National Labor Relations Board (NLRB) General Counsel Jennifer Abruzzo, a move widely anticipated. But he went further, illegally firing NLRB Board Member Gwynn A. Wilcox—depriving the NLRB of a quorum needed to issue decisions and make rules in labor disputes. This was part of a broader strategy to undermine the National Labor Relations Act, with a case likely heading to the Supreme Court to challenge its constitutionality. Trump took similar actions at the Equal Employment Opportunity Commission (EEOC), illegally firing Chair Charlotte Burrows and Commissioner Jocelyn Samuels, thereby sabotaging the agency's ability to function.

Simultaneously, Immigration and Customs Enforcement (ICE) has escalated worksite raids and I-9 audits, while the Occupational Safety and Health Administration (OSHA) is led by a former UPS and Amazon safety executive with a disastrous record on workplace safety. OSHA has also been systematically destroying workplace safety guidelines. Meanwhile, the Department of

Labor (DOL) is poised to be led by advocates for "right-to-work" laws, and the so-called Department of Government Efficiency (DOGE), led by Elon Musk, a vocal critic of labor rights, is firing tens of thousands of federal workers.

Given this hostile federal environment, it is more critical than ever that the New York City Council adequately fund the Department of Consumer and Worker Protection (DCWP). They play an essential role in ensuring that workers in New York City receive the compensation and protection they deserve in the workplace.

DCWP is at the forefront of investigating, adjudicating, and prosecuting labor and employment violations, addressing issues ranging from wage theft and unpaid sick leave to discrimination and harassment. However, with the federal government leaving a significant vacuum at agencies like the NLRB and EEOC, as well as actively undermining worker rights, current funding levels for city agencies are insufficient to safeguard the rights of New York City workers.

Now more than ever, workers in our city deserve strong agencies that will protect their rights in the face of federal neglect and opposition. To ensure that New Yorkers have the support they need, it is imperative that the City appropriate \$77 million for DCWP.

Thank you for the opportunity to testify on these crucial issues. Should you have any questions or concerns, please don't hesitate to contact Ashley Chen, Policy Analyst, at achen9@cpc-nyc.org.



Testimony from the Consortium for Worker Education (CWE)

Provided on March 21, 2025 to the Members of the Small Business Committee

To the Honorable Members of the City Council,

Good afternoon, Chair Feliz and esteemed members of the City Council. My name is Marco A. Carrión, and I represent the Consortium for Worker Education (CWE). For 40 years, CWE has been connecting New Yorkers to employment opportunities and educational resources, and I am here today to request your support for a vital funding initiative that will allow us to continue and expand this important work.

Who We Are

The Consortium for Worker Education (CWE) is committed to uplifting workers across New York City by providing education and workforce development programs. Our focus is on helping individuals gain access to meaningful employment opportunities and ensuring that they have the necessary support to succeed. We take a holistic approach, addressing critical areas of life such as housing, childcare, nutrition, legal support, and immigration services—all key factors that help workers overcome barriers to employment.

We operate through a large and diverse network of labor partners and community-based organizations. These partners provide the direct services that help individuals secure jobs, advance their careers, and achieve long-term economic stability. CWE plays a vital role supporting our partners through fiscal and administrative aid, ensuring that they have the resources needed to meet the needs of job seekers.

What We Do

At CWE, we believe that education is the key to empowering individuals. However, we understand that before someone can focus on securing a job, their basic needs must be met. Our model integrates workforce development with support for housing, childcare, legal aid, and more. This enables individuals to focus on gaining skills and seeking employment without being weighed down by other challenges.

We have built strong partnerships with labor unions and community-based organizations across the city, ensuring that our programs reflect the diverse needs of

New Yorkers. Through fiscal and administrative support, we ensure that these partners can deliver services to job seekers efficiently and effectively.

Why CWE Matters

CWE's funding is crucial because it allows us to leverage additional state funding for adult education. In this year's state budget, CWE was awarded \$13 million from the state legislature for adult education programs. However, to access this funding, we are required to secure matching funds from the City. Without these matching funds, we would be unable to draw down on the full state allocation.

This is where your support becomes vital. By providing the necessary matching funds, the City Council ensures that we can draw down 100% of our state funding, effectively doubling the resources available for adult education programs serving New York City residents. This means we can provide more services, more support, and greater opportunities for New Yorkers.

The City Council's funding allows us to maintain a strong, responsive network of partners who can serve job seekers without delays. It also ensures that our partners receive timely financial support, so they don't have to wait months to manage contracts with city agencies. This responsiveness is critical to the success of workforce development initiatives, and your support ensures that we can continue to meet the needs of New Yorkers in a fast-changing labor market.

Specifics of CWE's FY25 Funding Request

For this fiscal year, we are requesting a total of \$7.93 million to support four key programs:

1. **Jobs to Build On (JTBO)**, *Application#189666*
2. **Know Your Rights classes**, *Application #189832*
3. **Worker Service Centers (WSC)**, *Application #189772*
4. **Astoria Worker Project** (a new initiative housed under WSC), *Application #189934*

This request is part of the Speaker's Initiative funds, with the exception of the Astoria Worker Project, for which we are requesting \$100,000 in member items distributed across the Queens delegation and Council Members Caban, Krishnan, Moya, and Won.

Conclusion

The requested funds are essential to continue CWE's work, which directly benefits the New Yorkers we serve by helping them gain employment, access critical services, and

build better futures for themselves and their families. Your investment in CWE is an investment in the future of our workforce and the well-being of our city's residents.

We ask for your support in ensuring that we can continue our mission and expand our impact. Thank you for your time and consideration. I am happy to answer any questions you may have.



Testimony for NYC Department of Consumer and Worker Protection 3/19/25

By Salua Baida - Member, Hand in Hand: The Domestic Employers Network

Thank you, Chairwoman Menin and members of the committee, for the opportunity to testify today. My name is Salua Baida, and I am a proud domestic employer and member of Hand in Hand: The Domestic Employers Network, a group where employers actually advocate for the rights of their employees.

I come before you today not only as an employer, but also as the daughter of a former domestic worker (my mother was a house cleaner and home attendant to elders when I was a kiddo)—so my mother and I understand firsthand how critical it is for workers to know their rights, and for employers to understand their responsibilities.

Domestic workers—the nannies, house cleaners, and home care workers who make all other work possible—have long been excluded from basic labor protections.

And, while over the past decade, New York City has made incredible strides in righting this historic wrong through legislation like the Domestic Worker Bill of Rights and Intro 339 Protections for Domestic Workers Under the New York City Human Rights Law. But passing laws is only the first step. **The real challenge is making sure workers and employers alike know these rights exist, and that these laws are upheld.**

That's why I am here today to urge you to continue funding for the Department of Consumer and Worker Protection (DCWP), and to invest \$800,000 in the **NYC Coalition for Domestic Work's** "Domestic Worker and Employer Empowerment Initiative", which has done critical outreach and education in partnership with DCWP.

The nature of domestic work—isolated, behind closed doors, it's often between individuals with language and cultural differences, with serious power dynamics at play—work inside of someone's home makes the enforcement of labor laws uniquely challenging.

Without proactive education and outreach, many workers remain in the dark, vulnerable to wage theft and exploitation.

And without clear guidance, many employers—even those who want to do right by their employees—are left unsure of how to provide just and legal working conditions.



Our coalition, in partnership with DCWP, has been going directly into neighborhoods—into parks, libraries, and community centers—to meet home workers and their employers where they are. As mentioned earlier, many of these meetings are the very catalyst for folks being able to get **justice!**

We've been making sure that domestic workers understand their rights, and that employers understand how to uphold them.

This is the only way to truly shift industry standards and ensure a city where domestic work is valued and dignified. But this work cannot continue without sufficient funding.

We are calling on this New York City Council to ensure:

1. **\$2 million in additional funding** for DCWP, so it can continue enforcing labor protections for domestic workers.
2. Invest **\$800,000** in the Domestic Worker and Employer Empowerment Initiative, so we can expand our outreach and education efforts across all five boroughs, and continue to lead the way **nationally**.

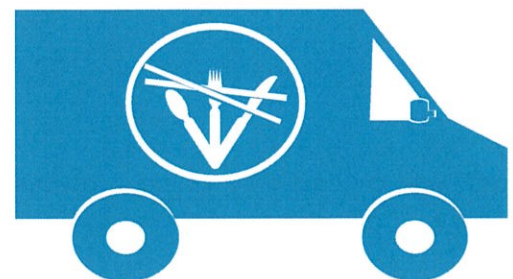
In this moment—when immigrants are both the **backbone** of our communities and yet the ones **under attack**—in this moment, when economic pressures are mounting—it is even more urgent than ever to ensure that the over 200,000 domestic workers who keep households running, which keep this CITY running, are not left behind.

This is not just about funding an initiative; it's about committing to a more just and equitable New York. **Domestic workers make all other work possible.** I urge you to stand with us, with them, in this fight.

Thank you,

Salua "Sal-wah" Baida
Forest Hills, NY

Fiscal Impact Of Eliminating Street Vendor Permit Caps in New York City



This report was prepared by Alaina Turnquist and Eric Mosher, with assistance from Richard DiSalvo and Jordan Paige, and supervised by Sarah Parker and Brian Cain. Report production was done by Tara V. Swanson.

Please direct any inquiries on this report to Eric Mosher at EricM@ibo.nyc.gov.

Executive Summary

Since the 1980s, there has been little change in the total number of street vending permits and licenses in New York City—City-issued documents that allow street vendors to sell food and goods legally. The demand from street vendors for permits outpaces the supply, as evidenced by waitlists of over 20,000 people for two types of street vendor documentation: Mobile Food Vendor (MFV) permits and General Vendor (GV) licenses.

At the request of 14 Council Members, led by Pierina Sanchez and Amanda Farías, IBO estimated that lifting the caps on the number of permits and licenses available to street vendors would have a small positive fiscal impact on the City's budget. New York City would see new revenues from tax collections, fines, and registration fees, but also increased costs of administering and monitoring the newly permitted vendors. IBO's findings include:

- The actual scale of fiscal impact would depend on the number of vendors that become newly permitted. If 10 percent of people on the current waitlists were to become permitted vendors, the net revenue gain to the City would be about \$1.7 million; if 100 percent of those on the waitlists became permitted, the net impact would increase to about \$17 million. IBO expects that new sales tax revenue from permitted vendors would be the largest source of new revenue.
- Vendor revenues and profits are modest, for both permitted and unpermitted vending. According to IBO analysis of vendor survey data, the average annual profit for all vendors in the City was roughly \$8,000 in 2019. General Vendors had lower average annual profits compared to Mobile Food Vendors—around \$6,800 compared to \$9,000, respectively.
- The overall macroeconomic impact of eliminating the caps on street vendor permits would be minimal, though the microeconomic impact to some individual vendors who become licensed would likely be substantial. For example, holding a legal permit or license would prevent some street vendors from receiving costly tickets and having their materials confiscated by law enforcement, assuming they follow other city rules and regulations while vending.
- Additional MFV permits would have higher administrative costs than GV licenses, primarily due to health department resources to inspect MFV units to ensure food safety. Although MFVs on average generate higher tax revenue than GVs, their total net fiscal impact per additional permit would be smaller. In this report, IBO defines “administrative costs” as vendor-related costs borne by the Department of Health and Mental Hygiene (DOHMH) and Department of Consumer and Worker Protection (DCWP).
- IBO assumed no additional uniformed agency enforcement costs would automatically result from removing the permit caps for street vending; any increase would be at the City's discretion. Law enforcement for vending has shifted away from criminal summonses and towards civil enforcement over the past decade. In this report, IBO defines “enforcement costs” as vendor-related costs borne by uniformed agencies, specifically the Department of Sanitation (DSNY) and New York City Police Department (NYPD).

Even without a cap on the number of permits and licenses for street vendors, vendors would need to comply with other street vendor regulations. For example, strict siting rules mean that many city streets are off-limits for vending (even with a permit), and food vendors are required to store their vending units in City-permitted commissary facilities, which have limited capacity. Therefore, while lifting the cap on permits and licenses would likely benefit many vendors and provide a positive fiscal impact to the City overall, it is unlikely to immediately bring all street vendors into the formal economy.

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Introduction

Street vending is a longstanding and fiercely debated facet of New York City's urban landscape. Though the number of street vendors in the City is unknown, some estimates suggest the total number of active vendors in the City may near or exceed 20,000.¹

Caps on the number of individuals allowed to vend legally within the City have seen little change since the early 1980s. Since 1979, General Vendor (GV) licenses—for the sale of non-food merchandise—have been capped at 853 (for non-veterans). In 1983, Mobile Food Vendor (MFV) permits—for the sale of food—were capped at 3,000, with the total number of MFV permits increasing to 5,100 since then. Reform efforts passed in 2021 as part of [Local Law 18](#) were designed to increase the number of legal food vending permits by up to 4,450 over the next 10 years.

The shortage of City-issued permits has contributed to a persistent informal vending economy in the City, as well as the creation of an illegal secondary market for city permits. Though official city licenses and permits only cost a low-level processing fee (typically \$200 or lower), permits and licenses rent at high prices on the illegal secondary market—in some cases, annual rents cost \$17,000 or more, according to IBO analysis.²

For years, vendors have protested the low number of permits, calling on the City to make more permits available to meet vendor demand.³ High-profile enforcement sweeps of prominent vending locations such as Corona Plaza and Sunset Park have driven headlines in recent months.⁴ The influx of migrants from South and Central America, many of whom have turned to vending on streets and subways, has also heightened the visibility of informal vending.⁵

IBO produced this report at the request of 14 City Council members—Pierina Sanchez, Amanda Farías, Diana Ayala, Carmen De La Rosa, Jennifer Gutiérrez, Shekar Krishnan, Julie Won, Carlina Rivera, Chi Ossé, Shahana Hanif, Kristin Richardson Jordan, Althea Stevens, Mercedes Narcisse, and Sandy Nurse—who asked IBO to estimate and analyze the potential impact of lifting the current caps on MFV permits and GV licenses—specifically, how lifting limits would affect city revenues, administrative and enforcement costs, and the overall city economy. IBO begins with a discussion of the history and current policy landscape of vending followed by an estimation of potential city revenues, fees, administrative and enforcement costs, and the overall economic impact that may result from the elimination of street vendor permit caps. This analysis does not address other regulations covering street vending in New York, such as siting guidelines that restrict vendors from operating legally on many city blocks.

In this report, for easier reading, IBO refers to all street vendors who have the necessary street vending paperwork to vend legally as “permitted”; those who do not are referred to as “unpermitted.” IBO includes all vendor-related spending by the Department of Health and Mental Hygiene (DOHMH) and Department of Consumer and Worker Protection (DCWP) under “administrative costs”; IBO includes all vendor-related spending by the Department of Sanitation (DSNY) and New York City Police Department (NYPD) under “enforcement costs.”

Current Street Vending Policy Landscape

Vending in New York City operates under a complicated regulatory framework in which an interlocking matrix of factors—caps on the number of permits or licenses, locations, variations for times, days, and seasons, type of products sold, and veteran or disability status—determine whether and where an individual can vend legally. Multiple city agencies have a hand in overseeing street vending, as shown in Figure 1.

Types of Vendors. Generally, the City recognizes three main types of vendors based on the category of products sold: General Vendors (GV), Mobile Food Vendors (MFV), and First Amendment Vendors. Types

Brief History of Street Vending Permits in New York City

Street vending in New York City has long been a facet of the City's urban landscape, with deep ties to the City's identity as a destination for new arrivals in the United States. Although early forms of mobile vending like pushcarts and dock sellers date back to the earliest days of the City's founding, modern city regulation of vending did not begin until the early 20th century.⁶

Initially, peddlers in the City were required to remain mobile. In the 1930s, Mayor LaGuardia utilized federal stimulus to construct indoor vendor markets, some of which still stand today. Markets were meant to create designated space for vendors and improve conditions primarily in crowded neighborhoods of new arrivals where pushcart markets had risen to prominence.⁷

The current regulatory environment for vendors began in the wake of the City's financial crisis of the 1970s—when “general economic downturn coupled with an influx of new immigrants and counterculture youth led to an increased visibility of vending in the city.”⁸ During this time, general vending became increasingly popular, as the startup costs are typically lower than mobile food vending.

With the increased influence of business interest groups in the wake of the financial crisis, Mayor Koch pushed to limit the number of vendors and the locations available within the City for vending. Following Mayor Beame's initial Midtown vending location restrictions passed in 1977, Koch passed a cap on GV licenses.⁹ The cap—set at 853—is still in place today. The cap on MFV permits followed in 1983 and was set higher at 3,000.¹⁰ In the 1990s, Mayor Giuliani's administration limited the allowed zones of vending within the City, proposing to close off most of the Financial District and large swathes of Midtown Manhattan.¹¹

Though vending regulations have become generally more restrictive over the past century, in multiple instances legal challenges have lifted vending caps for specific subsets of vendors. In 1990, a group of veterans sued the City citing a state law meant to benefit veterans returning from the Civil War by granting them the right to vend without restriction.¹² The legal challenge ultimately won unlimited GV licenses for veterans in the City. Additionally, in 1995, a group of visual artists sued the City, claiming that city restrictions on vending violated free speech protections in the state and federal constitutions. The legal challenge ultimately created unrestricted vending for vendors selling “expressive materials” such as books, music, and artwork in the City, protecting the ability of First Amendment Vendors to operate without licenses or permits.¹³

The cap on food vendor permits has also expanded since the initial caps to include a subset of 100 permits available specifically for veterans or individuals with disabilities and, separately, 1,000 temporary or seasonal permits. With the goal of bringing fresh produce to ‘food deserts,’ the City introduced 1,000 additional produce permits, also known as Green Carts, in 2008, during Mayor Bloomberg's administration.

Another reform came in 2021, when the City Council passed Local Law 18 to expand food vending through creating a supervisory license system, meant to cut down on the practice of illegal permit leasing that has been common among vendors due to the scarcity of legal permits. The law established a system to issue up to 4,450 supervisory license permits by 2032.

of vendors are distinguished by the category of products sold. GVs sell merchandise; MFVs sell prepacked food, prepared food, and produce; and First Amendment Vendors sell “expressive materials” such as art, music, books, magazines, and pamphlets.

Though the number of legal MFVs and GVs is limited through permit/license caps, First Amendment Vendors are constitutionally protected and thus cannot face permit/license caps. First Amendment Vendors must still remit sales tax and adhere to the same location/siting regulations as GVs. IBO’s analysis addressed the fiscal impact of allowing for unlimited permitting of GVs and MFVs. Any vending that is already unlimited—First Amendment and Veteran General Vendors—was excluded from IBO’s analysis.

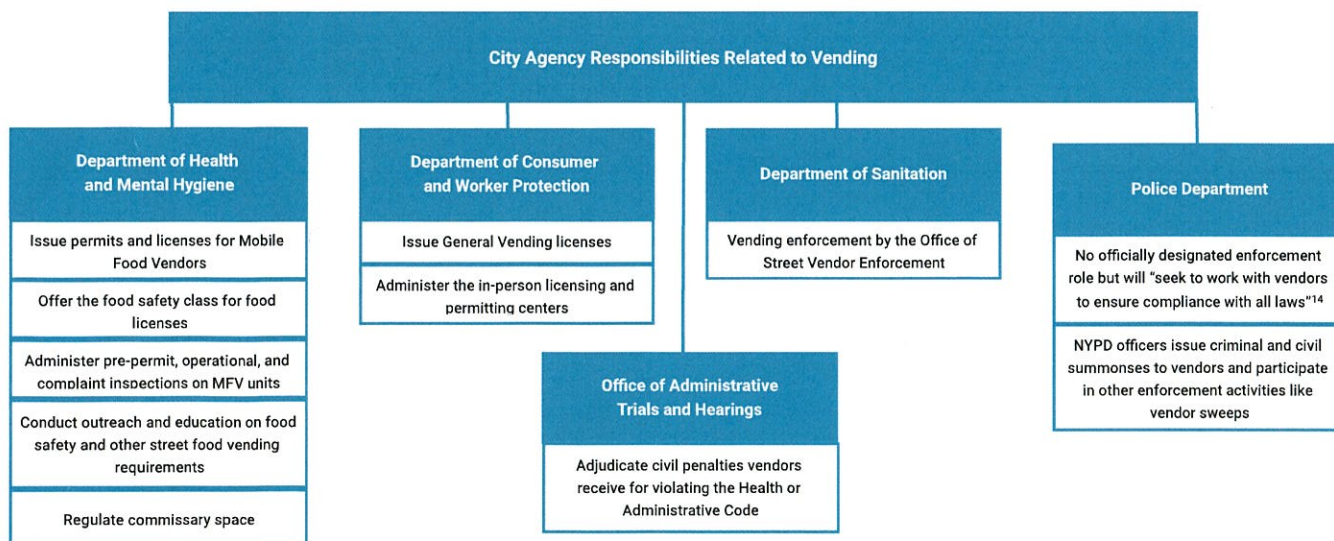
Licensing and Permit Caps: Mobile Food Vendors. The City’s regulation of Mobile Food Vending is highly complex, with multiple permit types and license types that each have specific requirements. The City is also currently in the process of implementing reforms passed in 2021, which bring new levels of complexity to the food vending license and permit structure. Most permitted food vendors in operation today vend under the older permitting system; the new permitting system will fully phase in by 2032.

Prior to the enactment of Local Law 18 in 2021, the City issued six different types of MFV Permits: Citywide, Temporary/Seasonal, Borough-Specific, Fresh Fruit and Vegetable (Green Cart), Restricted Area, and Specialized Disabled Veteran Vendor. Most of these permits allow vendors to operate in specified spaces within the City, and some permits are only available to certain categories of vendors—for example, military veterans and persons with disabilities.

Importantly, MFV permits are different from MFV licenses. An MFV permit is required for a vendor to operate a food vending unit legally, whereas a license is required for an individual to handle and sell food legally in the City. Unlike MFV permits, there is no cap on the number of MFV licenses issued by the City. A license-holder may legally work in a food vending unit without holding an MFV permit, as long as the unit has an associated permit-holder. Some MFV license-holders work for other vendors while they wait to receive an MFV permit from the City. As a result, the number of MFV licenses is about three times higher than the number of MFV permits.

Local Law 18 changed the landscape of MFV permits and licenses, creating a new license and permit framework. Under the law, the vendor must first receive a supervisory license, which then entitles them

Figure 1
City Agencies Involved in Street Vending



SOURCES: DCWP, DOHMH, DSNY, NYPD, and OATH data

New York City Independent Budget Office

to apply for a supervisory license permit. In the new system, a food cart or truck with a supervisory license permit must have a supervisory licensee physically present on the unit during business operation. Under the reform, all individuals with a supervisory license are entitled to apply for a supervisory license permit. DOHMH will issue 445 supervisory license applications annually for 10 years until 2032, eventually increasing the total number of MFV permits by up to 4,450.¹⁵

Unlike the older borough-specific MFV permits, which confine vendors to a specific borough outside Manhattan, supervisory license permits allow individuals to vend in any borough outside Manhattan. DOHMH now only issues Borough-Specific MFV Permits upon renewal.

Licensing and Permit Caps: General Vendors. For GVs, the City issues three subtypes of licenses: White, Yellow, and Blue. These subtypes were created by the State Legislature in the 1990s, in response to the legal challenge which provided unlimited GV licenses for veterans. Blue and Yellow licenses are only available to service-disabled veterans and offer expanded vending locations in the City. The 140 Blue licenses are the most coveted, as Blue license-holders are the only merchandise vendors allowed to operate within Midtown Manhattan. GV White licenses are capped at 853 and are available to any individual regardless of military service status. Figure 2 provides a comparison between GV and MFV regulations.

Other Types of Vending. To vend within city parks, vendors participate in the competitive bidding and proposal process that is managed and regulated by the New York City Department of Parks and Recreation. Vendors within city parks are considered “concessions” and receive permission to vend on park land through entering permitting/licensing agreements with the Parks Department. Such agreements often specify the location where the vendor can be within a park.

Figure 2

Overview of Street Vending Regulations (General and Mobile Food Vending)

	General Vending	Mobile Food Vending
Goods Sold	<ul style="list-style-type: none"> Merchandise 	<ul style="list-style-type: none"> Prepared food, prepackaged food, produce
Legal Permission	<ul style="list-style-type: none"> GV license 	<ul style="list-style-type: none"> MFV permit or supervisory license permit (by cart/unit) MFV license or supervisory license (by individual)
Primary Regulating City Agency	<ul style="list-style-type: none"> Department of Consumer and Worker Protection (DCWP) 	<ul style="list-style-type: none"> Department of Health and Mental Hygiene (DOHMH)
	853 GV licenses Unlimited for veterans Total = 853 + veteran licensees	Citywide permits: 2,800 Borough-Specific: 50 each, excluding Manhattan Disability/Veteran Specialized: 100 Seasonal/Temporary: 1,000 Green Cart: 1,000 Total = 5,100
Cap on Number of Vendors	** Subtypes: Blue, White, and Yellow licenses	** Plus 445 new supervisory license applications issued by DOHMH each year (2022-2032) ** Unlimited “Restricted Area Permits” available to vend on private property and no limit on number of specialized disabled veteran vendor permits
Wait List (as of October 2023)	<ul style="list-style-type: none"> 10,992 for non-veteran licenses 	<ul style="list-style-type: none"> 9,878 individuals on at least one waitlist
Total Number Active Legal Vendor Units	1,844 active licenses <ul style="list-style-type: none"> 775 non-veteran 1069 veteran As of October 2023	3,805 active units <ul style="list-style-type: none"> 3,755 active permits 50 supervisory license permits As of December 2023

SOURCES: DCWP and DOHMH data, and September 27, 2023 letter from Mayor Adams to City Comptroller

NOTE: Despite the legal cap of 1,000 Green Cart Permits, as of October 2023 only 220 permits were active within the city.

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Importantly, General and Mobile Food Vendors are prohibited from operating within city parks regardless of whether they possess a license/permit for vending elsewhere within the City. In the case of recent high-profile vendor sweeps in Sunset Park, the siting restrictions—not the permit and license cap—prohibit vending.¹⁶

Finally, to sell food or merchandise at city-authorized street fairs, block parties, or festivals, vendors must receive a Temporary Street Fair Permit (merchandise) or a Temporary Food Service Establishment Permit (food) and register with the authorized event where they plan to vend. Such permits are, in theory, unlimited—though they must be associated directly with a city-authorized event.

Data on Street Vendors

Reliable data on street vending is scarce. Because many street vendors operate outside the formal economy, there is little, if any, official government data on the income or profitability of street vendor businesses. While city agencies do have detailed information on current permit- and license-holders, the city government does not collect data on unpermitted vendors. There is no official headcount of street vendors in New York City, though an oft-cited estimate is about 20,000.¹⁷

The most detailed information on the street vendor landscape in New York City likely comes from Street Vendor Project (SVP), a non-profit organization of street vendors and advocates. In 2021, SVP conducted a survey of over 2,000 street vendors and collected information about their income and business expenses, both before and during the Covid-19 pandemic. The survey also collected demographic information such as age, country of birth, immigration status, as well as data on vendor permit status. Respondents included MFVs, GVs, and First Amendment Vendors; both permitted and non-permitted vendors are represented in the sample.

This data was generated from a survey sample and not a complete census of street vendors. If the estimates of 20,000 vendors citywide are accurate, then this survey covers about 10 percent of street vendors in 2021. The data likely overrepresents individuals who had a prior connection to SVP and may underrepresent vendor groups that are less prominent in SVP's membership—such as food trucks, veterans, and high-earning franchised vendors. Nevertheless, the SVP survey is likely the most comprehensive collection of data from the recent population of street vendors in New York City. IBO utilized the Street Vendor Project dataset. (The use of this dataset in no way implies that IBO supports or opposes SVP's advocacy agenda. For more details on this dataset, see the Appendix, which discusses IBO's methodology in more detail.)

The city agencies that oversee food vending (DOHMH) and general vending (DCWP) maintain waitlists of individuals who may be interested in applying for vending permits when permits become available. DCWP maintains the waitlist for GVs; its length as of October 2023 is 10,992 individuals. This list has been closed and has not accepted new applications since 2016.

For Mobile Food Vendors, DOHMH has maintained several different waitlists for different food vendor categories. Following Local Law 18 requirements, DOHMH created new supervisory license waitlists. DOHMH compiled the current list by including individuals that met at least one of two criteria: first, individuals who were previously on a DOHMH MFV waitlist, and second, individuals who had continually held food handling licenses since March 2017 but have not had a permit to operate their own vending unit. The current DOHMH list contains 9,878 individuals as of October 2023.

Notably, the DOHMH waitlists for citywide and non-Manhattan supervisory licenses have never been open to the public and the GV waitlist has not been open in seven years.¹⁸ These waitlists may be undercounts of all individuals in the City who are interested in vending—though presumably not all individuals on a waitlist would choose to apply for a permit or meet the qualifications for a permit, if the permit cap were lifted. Nevertheless, these two waitlists offer the clearest detail of the potential scale of additional street vendors in the event of broad liberalization of vending permits.

Fiscal Impact of Lifting the Cap on the Number of Street Vending Permits for New York City

Revenue and Expense Considerations. For the City, the fiscal impact of removing the cap on street vendor permits consists of the sum of new revenue and registration fees received by the City because of permitting additional vendors, less the costs incurred by the City to license, permit, and inspect the additional permitted vendors (see Figure 3). The actual fiscal impact depends on the number of vendors that successfully become permitted following the removal of the permit cap.

Unfortunately, there is no precise indication of the demand for new permits that would follow the elimination of permit caps. On one hand, there is clear demand for additional permits—both from anecdotal accounts of street vendors reported in the media and from the fact that some food vendors are willing to pay tens of thousands of dollars a year to lease valid permits from existing permit-holders via the informal market. On the other hand, it is impossible to say in advance how many currently unpermitted vendors would apply for permits as opposed to continuing to vend without a permit, even if the cap were eliminated. There are costs associated with applying for a vending permit, and some vendors may choose to remain unpermitted even if it were administratively possible to join the formal market.

Figure 3

Determining Fiscal Impact of Lifting Cap On the Number of Vendor Permits

$$(Sales\ Tax\ Revenue + Income\ Tax\ Revenue + Fine\ Revenue + Fees)$$

$$-$$

$$(Administrative\ Costs + Enforcement\ Costs)$$

$$Fiscal\ Impact\ to\ City$$

SOURCE: IBO Street Vendor Fiscal Impact Model
New York City Independent Budget Office

Creating an Incremental Fiscal Impact as a Baseline. First, IBO estimated the net increase in revenue for the City if 10 percent of both vendor waitlists applied for and were awarded new permits. For reference, 10 percent of the MFV waitlist is equal to 988 food vendors, and 10 percent of the GV waitlist is equal to 1,099 vendors. At this baseline, authorizing 10 percent of the Mobile Food Vendor waitlist to vend would yield \$600,000 in new revenue for the City, while 10 percent of the General Vendors would yield \$1.1 million, for a combined total of \$1.7 million in net new revenues. Referring to the 10 percent estimates in Figure 4, readers can develop scenarios that they think are realistic based on what scale of new vendor permits they believe would result from eliminating the current caps. For example, if a reader believes that eliminating the permit cap would lead to 50 percent of the current waitlists becoming permitted, the reader can multiply IBO's 10 percent estimates by five to arrive at a new estimate.

IBO's analysis found that, overall, the fiscal impact of new GV licenses and new MFV permits would be positive, yet small compared to the City's total \$110.5 billion budget. IBO also found that the fiscal

Figure 4

Fiscal Impact from 10 Percent of Current Waitlists Becoming Permitted Vendors

	Mobile Food Vendor	General Vendor	Total
Number of New Vendors	988	1,099	2,087
Sales Tax Revenue	\$920,000	\$980,000	\$1,900,000
Income Tax Revenue	\$160,000	\$50,000	\$210,000
Fines	\$20,000	\$20,000	\$40,000
Fees	\$770,000	\$220,000	\$990,000
Administrative Costs	(\$1,270,000)	(\$200,000)	(\$1,470,000)
Total Fiscal Impact	\$600,000	\$1,070,000	\$1,670,000

SOURCES: IBO analysis of DOHMH, DCWP, OATH and Street Vendor Project data

NOTE: Totals may not sum due to rounding.

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impacts of the two permit types would not be equal. Since MFV vendors require food safety training and additional inspections, it costs more for the City to administer MFV permits than GV licenses. As a result, a marginal GV license would have a greater net fiscal impact than a new MFV permit. The following sections on revenues and expenses include further discussion of estimated revenues and costs associated with eliminating street vendor permit caps.

Two Example Scenarios for Permit Demand. To illustrate two possible outcomes of eliminating the cap on street vendor permits, IBO developed two scenarios. These scenarios draw from IBO's fiscal impact baseline above, which estimates the fiscal impact of 10 percent of the current vendor waitlists becoming permitted. In the lower-demand scenario, new MFV permits and GV licenses equaled 40 percent of the permit waitlists. In the higher-demand scenario, new permits and licenses equaled 80 percent of the current waitlists. Figure 5 shows the net fiscal impact the City would experience under each scenario, according to IBO's estimates.

These scenarios are two of many possible outcomes. Different readers will have different assumptions for what they believe is an appropriate estimate of how many street vendors would become permitted if there were no permit caps. It is worth noting that, even under an assumption of strong uptake of permits by street vendors, the net fiscal impact to the City would be small relative to the City's overall budget; although the overall fiscal impact does not necessarily capture the financial impact that lifting the cap may have for individual vendors.

Street Vending Revenues

New tax revenue would be the largest source of new revenue from increasing the number of permitted street vendors. More revenue would be generated from sales tax than from income tax. This discrepancy reflects the fact that street vending, in general, is not a particularly high-income profession. As a result, many vendors earn too little income to necessarily owe income tax. Meanwhile, most vendors sell items on which sales tax must be collected, tracked, and remitted to the City and State. Newly permitted vendors would also lead to increased revenue from fines. (For example, this may include fines for not following food handling protocols or vending in prohibited locations). Finally, new vendor permits would generate additional fees from the permitting process.

Figure 5

Two Potential Scenarios for New Vendor Permits If Cap Were Eliminated

	Lower-Demand Scenario 40 percent of Waitlists Become Newly Permitted		Higher-Demand Scenario 80 percent of Waitlists Become Newly Permitted	
	Mobile Food Vendor	General Vendor	Mobile Food Vendor	General Vendor
Number of New Permits	3,951	4,397	7,902	8,794
Sales Tax	\$3,700,000	\$3,900,000	\$7,300,000	\$7,800,000
Income Tax	600,000	200,000	1,300,000	400,000
OATH Fines	100,000	100,000	200,000	200,000
Fees	3,100,000	900,000	6,200,000	1,800,000
Admin Costs	(5,100,000)	(800,000)	(10,200,000)	(1,600,000)
Fiscal Impact	\$2,400,000	\$4,300,000	\$4,800,000	\$8,600,000
Total Fiscal Impact	\$6,700,000		\$13,400,000	
Total Number of Permitted Vendors	14,341		22,689	

SOURCES: IBO analysis of DOHMH, DCWP, OATH, and Street Vendor Project data.

NOTE: Totals may not sum due to rounding.

New York City Independent Budget Office

Sales Tax. Using vendors' reported annual profits and business expenses from the SVP survey data, IBO found that an increase in street vendor permits equivalent to 10 percent of the current waitlists would generate \$1.9 million in new sales tax revenue. In this estimate, IBO excluded MFVs that primarily sell produce, as fresh fruit and vegetables are not subject to sales tax. Mobile food vendors would account for a slight majority of this new revenue, both because there are more people on the MFV waitlist and because food vendors reported slightly higher average revenues than GVs in the SVP survey. IBO's sales tax estimates factor in a level of non-compliance, based on estimates from the Internal Revenue Service on cash-based sole-proprietorship businesses. For more details, see methodology discussion in the appendix.

Income Tax. To calculate the effect of new vendor permits on income tax revenue, IBO used reported profits in the SVP survey. IBO considered "profits" in the survey as a stand-in for "income," because most street vendors are sole proprietors. An increase in street vendor permits equivalent to 10 percent of the current waitlists would create about \$210,000 in new income tax revenue for the City. Most of this new revenue—\$160,000—would come from food vendor permit-holders, for two reasons. First, MFV operations earn higher average annual profits than GVs (\$9,000 compared with \$6,800). Second, IBO assumed that each MFV permit has a multiplier effect on the number of street vendor food workers in a way that we cannot observe for GVs. MFV licenses are required for all street vendors who work with food, both permit-holders and other street-based food workers. For example, an owner of a permitted cart must have a license, as well as all employees. Based on the ratio of current MFV licenses to MFV permits—about 3:1—IBO assumed that each MFV permit would generate additional employment beyond the individual permit-holder. As a result, IBO estimated higher income tax from increased MFV permits than from increased GV licenses. IBO's income tax estimates also factor in a level of non-compliance.

Fine Revenue. The City collects civil fines from vendors after the Office of Administrative Trials and Hearings (OATH) adjudicates civil summonses.¹⁹ Recorded fines can vary from \$25 to \$1,000 depending on the severity of the violation. Using OATH data, IBO estimated that each additional permitted vendor would result in roughly \$22 in civil fine revenue, with MFVs paying on average \$24 per vendor and GVs paying \$17. For every 10 percent of vendors on the waitlists added, IBO predicted roughly \$40,000 in new revenue from fines.

Additionally, there are criminal summonses issued to vendors, which are discussed in the enforcement section of this report. IBO estimated that adding more permitted vendors would be likely to affect civil summonses and does not expect substantial additional criminal summons revenue from additional permitted vending.

Uncollected Fine Revenue and Fine Forgiveness. Currently, vendors must pay any outstanding fines to the City before being eligible to receive a license or permit. IBO's analysis of the profits reported in the Street Vendor Census indicates that most unpermitted vendors have modest earnings compared to permitted vendors. For unpermitted vendors seeking to legalize, having outstanding fines owed to the City may be a barrier and could affect the number of individuals who would convert from the informal to formal market.

The City could choose to pursue civil fine forgiveness for vendors on a one-time basis. IBO estimated that uncollected vending-related fines total over \$780,000, which includes all fines assessed since 2013. From 2018 through 2022, roughly 38 percent of all vending-related civil fines went unpaid. The most common type of civil summons issued to vendors was related to vending in a place where vending was not allowed followed by a vendor not having the proper license or permit. Importantly, it is unclear how much of this uncollected revenue would realistically be collected if it is not forgiven. For that reason, and because this cost is optional, the cost of fine forgiveness was not factored into IBO's overall fiscal impact analysis.

Also, "ghost fines"—fines owed by an individual who is not a real identifiable individual—are believed to be common in civil penalty data. Such uncollectable fines may be more common for vending because

unpermitted vending is one of the limited options for individuals who face barriers to entering the formal economy.

Additionally, unpaid fines resulting from civil summonses eventually transfer from OATH to the Department of Finance (DOF), which can collect interest and additional fines on unpaid sums. This would suggest a higher total of uncollected fines—though by the time revenue from unpaid vendor fines reaches DOF for collections, IBO assumes this revenue is likely not revenue the City would realistically ever receive.

Administrative Fees. In the process of awarding new permits to food and merchandise vendors, city agencies would collect fees. Fees should be set at rates high enough to cover the costs of administering the licenses, but not so high that they can be considered as a new revenue source. Nevertheless, fees from newly permitted vendors would represent additional new money coming into the City that would at least partially account for the costs of administering the additional licenses.

Under the current fee structure, MFV fees depend on three factors: first, whether a vendor holds a permit and a license or just a license; second, what kind of food the vendor wants to sell; and third, whether the license is a supervisory license. MFV permit-holders pay between \$15 for a seasonal permit to sell pre-packaged food and \$200 for a full-term permit fee if food is prepared on-site. The food vendor license has a \$50 fee for a first-time license and a \$60 fee upon renewal. Each license-holder must take a mandatory food protection course—which costs \$53—once before receiving a license for the first time. For the supervisory license, the new license category established by Local Law 18, the fee is \$0 on issuance and \$438 every two years thereafter. The supervisory license permit has the same fee structure as full-term permits prior to Local Law 18 (which cost up to \$200 for a two-year term).²⁰

GV licenses expire on September 30 of every odd year, so they are eligible for a maximum of two years. Permit fees range from \$50 to \$200, depending on the length of time until the next expiration date.

IBO's analysis found that, for each 10 percent of the combined waitlists that become permitted vendors, the City would receive about \$1 million in additional licensing and permitting fees. This calculation assumed a continuation of the supervisory license fee structure established by Local Law 18.

Street Vending Expenses

DOHMH and DCWP—tasked with administering mobile food vending and general vending, respectively—would both require additional resources if the number of vendor permits were to increase. The administrative costs of additional MFVs are notably higher than adding GVs. Unlike administrative costs, which are directly tied to the number of permitted vendors in the City's legal vending system, enforcement costs are determined by the law enforcement agencies that oversee street vendors. These agencies likely make enforcement decisions based on the number of overall vendors in the City, regardless of permitted or unpermitted vending status. IBO assumed that increasing the number of permitted vendors would not necessarily lead to higher enforcement costs from DSNY and NYPD.

Administrative Costs. IBO estimated that the City would incur more costs per MFV added—\$1,286 per vending unit—than that for each GV added—\$179 per vending unit. For every 10 percent of the waitlist that received a new permit or license, the City would incur \$1.5 million in new administrative costs.

The difference in the cost of food and merchandise vending administration is largely due to the health code administration costs the City incurs for Mobile Food Vendors but does not incur for GVs. IBO estimated that DOHMH's permitting and licensing regimen is more costly to administer overall because it requires the permitting and licensing of Mobile Food Vendors, as well as the enforcement of the health code through inspections.

Figure 6

Costs to Administer Mobile Food Vendors and General Vendors

DOHMH Cost per Mobile Food Vending Unit	DCWP Cost per General Vendor
Permit: \$989 per permit <ul style="list-style-type: none"> \$716 inspection cost per unit + \$273 permit issuing costs per unit Inspection cost factors in cost of potential repeat visit License: \$297 <ul style="list-style-type: none"> \$96 per license Uses license multiplier assuming 3 licenses per new permit 	License: \$179 issuance cost
Total = \$1,286 per vending unit added	Total = \$179 per license added
SOURCES: DCWP and DOHMH Agency Permitting and Licensing Fee Schedules <i>New York City Independent Budget Office</i>	

Enforcement Agencies. The City's approach to vending regulation enforcement has undergone several shifts in the past decade, including decriminalization and the reassignment of vending enforcement responsibilities to several agencies. Prior to recent changes, NYPD was the primary city agency officially responsible for enforcing vending regulations, through the issuance of both criminal and civil tickets. NYPD is a uniformed agency with arrest and enforcement powers. The City's 2021 reforms created the Office of Street Vendor Enforcement (OSVE), which was then assigned to DCWP, a civilian agency. In April 2023, Mayor Adams transferred OSVE into DSNY.²¹ The transfer represented a return to using uniformed officers within the City to enforce vending regulations.

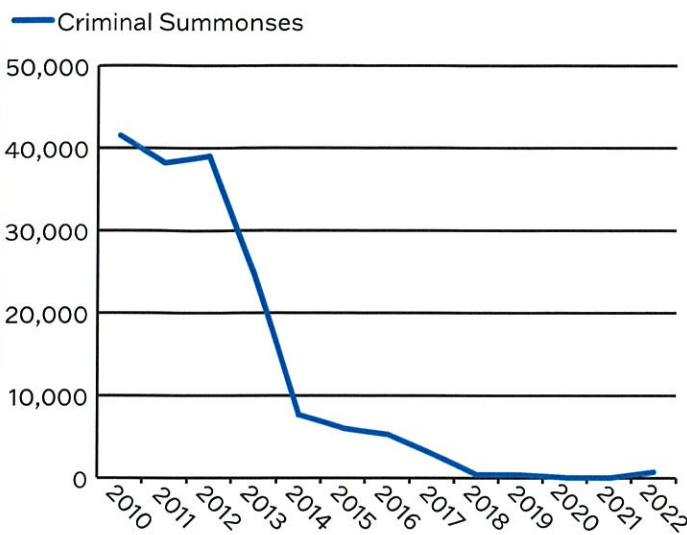
While additional permitting and licensing staff are inherent costs to increased permitted vending, the City's approach to enforcement is a discretionary policy decision. To this point, enforcement of

vendors over the past decade has shifted significantly away from criminal ticketing and towards civil enforcement of vending regulations. The number of criminal summonses issued to vendors has gone from roughly 42,000 in 2010 to less than 800 in 2022, as shown in Figure 7. This is consistent with a citywide trend of shifting low-level offenses from criminal to civil summons, most notably through the City's 2016 Criminal Justice Reform Act. There is no indication that the vending practices and number of vendors in the City changed during this time; rather, such drops are accounted for by discretionary enforcement practices on the part of city enforcement agencies.

Potential enforcement actions against vendors include vendor sweeps, criminal or civil ticketing, inspections, and confiscations, only some of which result in a formal summons. DSNY and NYPD enforcement actions mainly rely on community complaint data for targeting vending enforcement—including 311, Community Boards, elected officials, and "major stakeholders."²² Though NYPD has no official role in the enforcement of vending, the agency's involvement is ongoing. According to the department, "the NYPD will seek to work with vendors to ensure compliance. Enforcement actions may follow if there is chronic non-compliance."²³ NYPD also noted that because the agency has no official role in vending enforcement, the amount of agency cost and resources spent on vending is not centrally tracked. Thus, though some enforcement costs are borne by NYPD, there is no tracked information available from the agency to determine what such costs may be or what the impact of a more permissive legal environment for vending would be on NYPD enforcement costs.

Enforcement Costs. Additional enforcement costs are not necessarily anticipated should the City move to create a more permissive legal vending environment. IBO assumes that most of the initial entry to permitted vending would be individuals who are already vending without permits; this switch would not likely generate additional enforcement costs, because law enforcement officers are already employing a set amount of resources to monitor and enforce the existing vendor population. The City could decide to increase law enforcement spending targeted at vendors, but that would not necessarily result from eliminating the cap on street vendor permits.

Figure 7

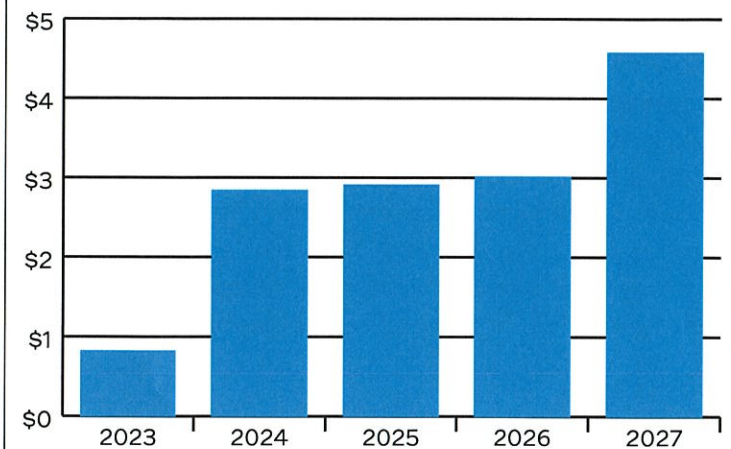
Criminal Summonses for Vending

SOURCE: NYPD Criminal Summons data
New York City Independent Budget Office

Figure 8

Department of Sanitation Enforcement Costs

Dollars in millions



SOURCE: New York City Department of Sanitation data
New York City Independent Budget Office

DSNY is the primary agency responsible for enforcing street vending regulations in the City and does so through the designated OSVE. DSNY currently has \$2.9 million budgeted for OSVE, and a budgeted headcount of 40 employees, as of the Fiscal Year 2024 Adopted Budget. The budget is set to increase to \$4.7 million by fiscal year 2027.

Economic Impact

The main economic impact of removing the cap on vendor permits and licenses would come from formalizing the economic activity of currently unpermitted street vendors. If an unpermitted vendor gains a permit, the vendor will be required to pay taxes on income and business revenue that is currently not taxed.

Bringing vendors into the formal economy would also likely generate slightly higher GDP for the City, since their business income would now be counted rather than unreported. The effect would be small; if 100 percent of both waitlists were to gain permits, IBO expects that the effect on New York City's GDP would be an increase of about \$17 million, or 0.0012 percent.²⁴

Any broader economic impact from this policy would depend on whether it inspires people to begin street vending instead of choosing to participate in other sectors. To address this question, IBO reviewed academic literature that explores what factors lead to growth in street vending and other informal markets both in the United States and in other countries. Most academic literature concludes that participation in the informal economy is driven mainly by macroeconomic factors (such as limited access to other job opportunities), cultural factors, or both, rather than the licensing structure in a municipality. Because of this, IBO does not expect that eliminating the cap on vendor permits would lead to many additional people choosing to become street vendors.

Among academic literature on the topic, Hassan and Schneider (2016) claim that, globally, participation in the informal economy is driven by high tax burden, high regulatory burden, high unemployment rate, high self-employment rate, and poor quality of local institutions.²⁵ Al-Jundi et al. (2022) conclude that poverty, lack of education, immigration status, lack of employment prospects, and lack of access to finance are the primary forces that drive people to choose to be street vendors.²⁶ Kelmanson, Kirabaeva, and Medina (2021) point out that in developed economies, macroeconomic factors may be more important than institutional

factors when predicting the size of the informal market.²⁷ Other studies note that some vendors are willing to accept lower business scale in exchange for avoiding the costs of formalization, including onerous tax declarations and time-intensive licensing processes (Bromley 2000, Recchi 2020, Pileri 2021).²⁸

Although IBO expects that the broad economic impact of removing vendor permit caps would be modest, the policy could have significant positive effects for individual vendors—particularly those who spend tens of thousands of dollars a year on leasing a permit from a current permit-holder. If vendors in this position could instead secure a city-issued permit for the notably lower cost of the City's licensing fee, they could increase their annual profits by thousands of dollars. It is also possible that acquiring a permit could allow vendors to access capital markets in new ways, potentially leading to new business expansion and higher incomes for street vendors. Similarly, should newly permitted vendors have more profitable businesses, they may use fewer public benefit resources or invest some of their new earnings into the local economy. All these scenarios, however, are impossible to model in any way beyond speculation, due to the lack of data.

Conclusion

This report explores the potential fiscal impacts of eliminating the caps on GV and MFV permits issued by New York City. IBO's analysis predicts that the overall fiscal impact of eliminating vendor permit caps would be positive but small. Compared to the total city budget, currently set at \$110.5 billion, the potential new revenue from adding street vendor permits is not large. Permitting more street vending, however, would likely have a major impact for participants in the industry currently operating without permits due to the capped number of authorized permits.

The scale of this policy's fiscal impact depends on the number of street vendors who choose to become permitted. Since this number is impossible to predict accurately, IBO presents the expected fiscal impacts of 10 percent of the current GV and MFV waitlists choosing to become permitted. Readers can build their own fiscal impact estimates based on their assumptions for how many street vendors would choose to get permits if there were no limits on applying.

One important takeaway from IBO's research is the differences in administrative costs for GVs and MFVs. IBO finds that the net fiscal impact of any newly permitted vendor would be positive because the licensing fees and tax revenues outpace the costs of administration. For MFVs, however, the administrative costs are higher, mostly because administering food vendors requires active inspections and food safety enforcement. As a result, the net fiscal impact for each new MFV would be lower than for each new GV.

Lastly, if the City were to raise the caps on the number of vending permits and licenses, it would not unilaterally address the challenges that street vendors face. To operate fully within the law, street vendors must avoid many streets across the City; for example, under current siting regulations there is only one street in the Bronx where mobile food vending is allowed at any time during the week.² If vendors fail to comply with complicated rules about where they vend, they may be penalized with steep fines. Permitted food vendors must use city-licensed commissary locations to store and clean their units; however, limited commissary space may make it difficult to follow this regulation. Also, any outstanding fines would make a street vendor ineligible for a permit, under current rules. Therefore, while lifting the cap on permits and licenses would likely benefit many vendors and provide a positive fiscal impact to the City overall, it is unlikely to immediately bring all street vendors into the formal economy.

Appendix: Methodology

Street Vendor Project Survey Data

IBO received data from the Street Vendor Project (SVP) containing the results of an extensive survey administered to 2,060 vendors. This survey is the only known survey of its kind both in scale and level of detail on individual vendors in New York City. Because of a lack of comparable data on the informal economy of street vending, IBO chose to assume that the sampling of vendors within the survey data was representative of the overall vending population within the City, for the purposes of this analysis. IBO was not involved in the collection or verification of the data, but considers it likely the best available information on an otherwise-unquantified industry sector. As stated previously, the use of this dataset in no way implies that IBO supports or opposes SVP's advocacy agenda.

It is likely that the SVP data overrepresents individuals connected with the Street Vendor Project's organizing in the City and underrepresents vendor types who tend to be less involved in the organization such as high-earning vendors and franchised food trucks.

The survey data was collected in 2021, which was a year highly affected by the Covid-19 pandemic. Vendors reported profits from both before and during the pandemic in the summer and winter. The business expenses, however, were only reported in one variable, and vendors did not have the option to report changes in their business expenses from before and after the pandemic or on a seasonal basis. IBO considered the pre-pandemic vending numbers to be more aligned with the current state of vending in New York City, but also recognized that central business districts have not reached the same weekday occupancy and foot traffic as prior to the pandemic.

Vendors estimated their profits and business expenses in ranges. IBO used the midpoint of the range for our calculations. In calculating annual profits, IBO assumed six months of winter profits and six months of summer profits for each year. Annual revenue was calculated by adding the annual business expenses to the annual profits both before and during the pandemic for each individual vendor.

IBO included Restricted Area Permits for MFVs in our calculation of costs and revenue under the current permitting system. Restricted Area Permits require vendors to have a lease agreement with a private property owner; the vendor cannot vend widely within the City. IBO assumed that fine revenue, fees, and administrative costs included Restricted Area Permits and thus incorporating them into overall permit numbers in the model results in more accurate estimates of cost and revenue per vendor. Currently there are roughly 358 Restricted Area Permits. These permits are unlimited and not represented in the 5,100 vending permit cap for MFVs.

Sales Tax Revenue

To calculate the effect of new vendor permits on sales tax revenue, IBO started with vendors' reported annual profits and business expenses, from the SVP survey. IBO summed the reported profits (for six months of winter and six months of summer) and business expenses for each vendor to reach an estimate of total business revenue for each vendor. IBO then estimated average annual revenue for all vendors and for each vendor category: MFV and GV. Because the SVP survey data asked for vendors' profits and expenses in 2019, IBO adjusted business revenue figures for inflation from June 2019 through September 2023 using the Consumer Price Index in the New York-Newark-Jersey City metropolitan area.

To determine total sales revenue received by new vendors, IBO multiplied the average revenue estimate for each vendor type by new vendors equivalent to 10 percent of that vendor type's waitlist. Because many food vendors sell produce, which is not subject to sales tax, IBO then adjusted the vendor revenue estimate to remove greengrocer vendors. According to the SVP survey data, 25 percent of mobile food vendors list "produce" as their primary fare, and 27 percent of MFV revenue accrues to food vendors who specialize in produce sales. Taking the average of these two percentages, IBO decreased the total food vendor sales by 26 percent to account for the sale of sales-tax-exempt items. IBO then applied the local sales tax rate of 4.5 percent to determine the amount of new sales tax revenue received by the City. IBO's model assumes that vendors will continue to have a similar distribution of sales revenue as the number of permitted vendors grows.

Finally, according to research by the United States Internal Revenue Service (IRS), tax evasion by cash-based sole proprietorships is widespread. The IRS has estimated that sole proprietors evade paying taxes on up to 57 percent of their cash sales.³⁰ With no further clarity on the rate of tax noncompliance by street vendors, IBO assumed that street vendor tax noncompliance will fall at the midpoint between 0 percent and 57 percent. Therefore, IBO's estimate of expected sales tax revenue was decreased by 28.5 percent.

Income Tax Revenue

To calculate the effect of new vendor permits on income tax revenue, IBO began by looking at the reported profits of all vendors who reported non-zero profits in the SVP survey. IBO considered "profits" in the survey as a stand-in for "income," because most street vendors are sole proprietors, and their business profits will equal personal income.

Based on vendors' reported profits/income, IBO arranged each vendor into the appropriate 2019 personal income tax bracket. For the purposes of these calculations, IBO assumed that all vendors would file income taxes as single filers or as married filing separately. This approach is meant to approximate the average income tax liability for individual street vendors in New York City, because the SVP survey did not capture information on spousal income. IBO then subtracted the standard deduction of \$8,000 from each vendor's income to arrive at a figure of taxable income for each vendor. Based on income tax brackets, IBO applied the appropriate income tax rate to each vendor's taxable income to determine individual and average income tax liabilities for street vendors in 2019.

IBO then determined how many people are represented by 10 percent of the vendor waitlists. To find the number of total MFV workers expected from these new permits, IBO found the ratio of MFV license-holders to MFV permit-holders (3.09). Because individuals are allowed to work at a mobile food cart after receiving a MFV license (even if they do not hold a permit), IBO assumed that the ratio of MFV license-holders to MFV permit-holders would stay the same in a scenario in which the cap on permits were lifted. Therefore, on average the total number of new income taxpayers for any additional MFV permit would be just over three people. IBO's income tax calculations account for this observed employee multiplier effect from MFV permits.

IBO then multiplied the average vendor income tax liability calculated above by 10 percent of the GV waitlist and by 10 percent of the MFV waitlist, with the MFV waitlist scaled up to account for additional workers as discussed above.

IBO accounted for the fact that certain percentages of city street vendors will live outside the City, and therefore will not pay New York City income tax. Based on the combined street vendor waitlists, IBO estimated that about 3.5 percent of GVs and 14.3 percent of MFVs live outside New York City. IBO adjusted the income tax estimates downward to account for non-resident vendors.

IBO used the Consumer Price Index for all items in the New York-Newark-Jersey City metropolitan area to adjust the average income tax liability for inflation from June 2019 through September 2023. IBO's model assumes that vendors will continue to have a similar distribution of profits and income tax liability as the number of permitted vendors grows.

Finally, as with sales tax, IBO's income tax estimates account for a certain amount of tax noncompliance. Again, based on IRS estimates of tax noncompliance rates by cash-based sole proprietorships, IBO assumes that street vendors will underreport their revenues and profits by 28.5 percent when filing income taxes. As a result, expected income tax revenue was adjusted down by 28.5 percent.

Fine Revenue

IBO's calculation of fine revenue was based on civil summons fine data provided to IBO by OATH. The fine data spanned from January 2013 through September 2023 and included separately provided files for food vendor, health, and GV violations. The Health Code Violations were for all health violations over the past 10 years. IBO reviewed each violation type and selected those that appeared to pertain to vending.

First, any fines recorded with negative values in balance due or balance paid were removed from the data. IBO looked first at the types of violations that were most common in the data, before adding up the total paid and unpaid balances and dividing them by the number of current permitted vendors in the City. The number of current permitted vendors was based on how many active licenses and permits there are, not permit caps. This is because there is some turnover and delay within the agencies so not all permits/licenses are active at any given time.

IBO's fine revenue estimates may have undercounted health violations by vendors. Since there is no way to know what percentage of general violations were from mobile food vendors, IBO assumed that only vending-related health violations were revenue-generating. There could be small fine revenue growth in other general health code violations as a result of a more permissive legalization regimen.

Mobile Food Vendor Fees

To calculate total fees from MFV permits and licenses, IBO found the average fees collected from MFV permits and licenses during fiscal years 2018, 2019, and 2022. IBO did not include 2020 or 2021, because they were low outliers following the COVID-19 pandemic. The average fees collected in the years studied was about \$960,000.

Because this figure contains fees from both MFV permits and licenses, IBO disaggregated the fees collected from each of these categories.

There are currently 16,806 active MFV licenses. Since these licenses need to be renewed every two years, IBO modelled that about 8,403 MFV licenses will be renewed each year. When a vendor first applies for a food vending license, the vendor must pay the \$50 license fee as well as a \$53 fee for a food safety training course, or \$103 total. Based on the long-term average number of new food vendor licenses granted in the six years before the pandemic (from 2014 through 2019), IBO estimated that about 8 percent of food license grantees would pay the first-time license price in a given year. The remaining 92 percent of vendors in a given year would pay the license renewal fee of \$60. Therefore, IBO assumed that the total average license fee paid per vendor would be \$63.52, a weighted average of the two fee amounts above. The total annual license fees—8,403 licenses times \$63.52 per license—equals about \$530,000. For 10 percent of the MFV waitlist, IBO multiplied the expected fee per license by the expected number of additional license-holders that would be generated by 10 percent of the MFV waitlist becoming permitted.

After subtracting license fees, the remainder of the total MFV fees in an average year would be about \$420,000. This amount represents the total fees from MFV permitting in an average year. IBO then divided the MFV permitting fees by the total number of MFV paid permits (4,113) to reach an estimate of average annual fees per MFV permits collected by the City. The estimate is \$102.90, about half of \$200, which is the highest vendor permit fee. IBO multiplied this fee estimate by 10 percent of the MFV waitlist to arrive at an estimate of additional fees from new MFV permits. IBO summed expected new fees from permits and expected new fees from licenses to calculate expected overall new fees if the number of MFV permits were to increase.

General Vendor Fees

IBO's calculation of expected GV fees relied on the current fee structure for GV licenses, which expire on September 30 of each odd year. The longest a GV license can be valid is two years. License fees range from \$50 to \$200, depending on how far away the next expiration date is. IBO assumed that most new general vendors would pay \$200 per license application or renewal in order to hold the license for the full two-year period. To calculate total expected fees from 10 percent of the GV waitlist becoming permitted, IBO multiplied the average fee per vendor by 10 percent of the GV waitlist.

DOHMH Administrative Costs

IBO relied on DOHMH budget and personnel data from fiscal year 2023 to calculate increased administrative costs. Administrative costs were assumed to be linear, increasing on a per vendor basis. Our administrative cost calculation per vendor was created by summing the cost of permit issuance, the cost of license issuance, and the cost of the health inspection. To the estimate cost of license issuance, we applied a permit multiplier of three to represent additional license issuance that would result from a single new permit. IBO assumed the administrative DOHMH staff costs to be evenly split between permitting and licensing. IBO divided the total annual personnel costs by the average number of permits issued each year and the average number of licenses issued each year which led to a permit cost of \$273 per permit and a license cost of \$96 per license.

To get the cost of the health inspection, IBO divided the permitting processing staff costs by the number of carts inspected each year, provided by DOHMH (about 4,200 unique units inspected). DOHMH pays intracity funds to DCWP to run the licensing centers. Such costs were factored in here as costs to DOHMH as they are costs for MFV permitting and paid to DCWP by DOHMH.³¹ Importantly, without operational expertise on the software and behind-the-scenes processing of permits and licenses, it is impossible to know where economies of scale may exist in the permitting/licensing process. The potential existence of economies of scale may drive down the cost of processing per license or permit.

DCWP Administrative Costs

To calculate DCWP administrative costs, IBO relied on agency budget and personnel data from fiscal year 2023 and DCWP Open Data on licensing. IBO assumed a linear increase to personal costs per license issued.

IBO determined the cost of all GV licenses by multiplying the percentage of all licenses issued by DCWP for general vending by the cost of all license issuances for DCWP. That cost was then divided by the number of GVs to get the average cost per license.

Glossary

DCWP: The Department of Consumer and Worker Protection (DCWP) licenses more than 45,000 businesses in more than 40 industries and enforces key consumer protection, licensing, and workplace laws. The agency also conducts research and advocates for public policy that furthers its work. DCWP also issues GV licenses.

DOHMH: The Department of Health and Mental Hygiene (DOHMH) is responsible for public health along with issuing birth certificates, dog licenses, and conducting restaurant inspection and enforcement. DOHMH also issues MFV permits and licenses.

DSNY: The Department of Sanitation (DSNY) is responsible for garbage collection, recycling collection, street cleaning, and snow removal. The DSNY is the primary operator of the New York City waste management system.

Expressive Materials: Expressive materials include materials or objects with expressive content, such as newspapers, books or writings, or visual art such as paintings, prints, photography, sculpture, or entertainment. Expressive materials are allowed to be sold by street vendors under the First Amendment.

First Amendment Vendor: A First Amendment vendor is a person who sell newspapers, magazines, music, books, and art on the street. However, you still must abide by the City's many restrictions on where you put your table, and there are many streets where you cannot vend at all. You must also abide by the New York State tax law by getting a tax ID ("certificate of authority") and by collecting and paying sales taxes on what you sell.

General Vendor: A general vendor is a person that sells, leases, or offers to sell or lease non-food goods or services in a public space that is not a store.

General Vendor License: A General Vendor license is required for anyone that will sell, lease, or offer to sell or lease goods or services in a public space that is not a store. The maximum number of General Vendor Licenses that DCWP issues to non-veterans is limited by law to 853. DCWP's waitlist for non-veteran applicants is currently closed. The following individuals may submit an application for a General Vendor License: an individual with a valid waitlist number issued by DCWP; an honorably discharged veteran residing in New York State; or the surviving spouse or domestic partner of an honorably discharged veteran residing in New York State.

Mobile Food Vendor: A mobile food vendor is a person who sells food (or distributes it free of charge) from a mobile food vending unit in any public, private or restricted space.

Mobile Food Vendor License: The Mobile Food Vending License is issued to an individual who will prepare and/or serve food from a permitted mobile food vending unit (truck or pushcart). The license is issued by DOHMH as a photo ID badge. There are no waitlist to apply for the Mobile Food Vending License. All applicants for a Mobile Food Vending License must pass the Food Protection Course for Mobile Food Vendors before they are issued a license.

Mobile Food Vendor Permit: A mobile food vendor permit is documentation issued by DOHMH that qualifies a mobile food vending unit. The permit allows the mobile food vending unit to sell or distribute food legally. DOHMH is limited by law in the total number of street vending permits that may be issued. There are waitlists to apply for a permit unless you plan to operate a Restricted Area Food Vending Permit.

Mobile Food Vending Unit: A mobile food vending unit is a food service establishment within a pushcart or vehicle that is used to store, prepare, display, serve or sell food — or distribute it free of charge — for consumption in a place other than in or on the unit. Any such pushcart or vehicle is considered a mobile food vending unit, whether it's operated indoors or outdoors on public, private or restricted space.

NYPD: The Police Department (NYPD), officially the City of New York Police Department, is the primary law enforcement agency within New York City.

OATH: The Office of Administrative Trials and Hearings (OATH) is the City's central independent administrative law court; it is not part of the state court system. The OATH Hearings Division is the division of OATH that is responsible for holding hearings on summonses issued by a variety of City enforcement agencies.

OSVE: The Office of Street Vendor Enforcement (OSVE) is a dedicated vending law enforcement unit that exclusively enforces vending laws. OSVE was created as part of Local Law 18. Originally part of DCWP, the office was moved to DSNY when the Sanitation Department took over street vendor enforcement in 2023.

Restricted Area Permit: The Restricted Area Mobile Food Vending Permit authorizes mobile food vending on private property in a commercially zoned area or on property under the jurisdiction of the Department of Parks and Recreation and is exempt from the statutory limits which apply to public street vending. This permit type is exempt from the limits imposed on public street vending and does not require being on a waitlist. Examples of situations which qualify as "outdoors on private property" include: a private commercial parking lot; an outdoor shopping mall or shopping strip; a vacant fenced-in lot area; the area within a gasoline station. The sidewalk in front of someone's store is considered public space, not private property, and therefore does not qualify.

Endnotes

¹Stefanos Chen and Raúl Vilchis, [“They Make Some of New York’s Best Food. They Want the Right to Sell It,”](#) New York Times, August 5, 2023.

²It is difficult to accurately determine permit leasing costs incurred by vendors. The practice is not legal and thus reported costs vary based on the individuals surveyed. The Street Vendor Census data, used by IBO in this report’s calculations, show an average cost of \$17,000 (with a similar indicated median cost).

³Tanaz Meghiani, [“Food Vendors Protesting City Hall Say Things Are Worse After New Law Was Supposed to Make Them Better,”](#) The City, September 29, 2022.

⁴See Haidee Chu, [“Crackdown Continues at Corona Plaza, Where Vendors Had Thrived,”](#) The City, August 10, 2023, and John Leland, [“Politics, Police, Pozole: The Battle for Sunset Park,”](#) The New York Times, May 14, 2023.

⁵Nicole Hong and Ana Ley, [“Turning to Street Vending, New Migrants Find a Competitive World,”](#) New York Times, October 10, 2023.

⁶Bluestone, Daniel. (1991). “The Pushcart Evil: Peddlers, Merchants, and New York City’s Streets, 1880-1940. Journal of Urban History. 18 (1): 68-92.

⁷Devlin, R. T. (2010). Informal Urbanism: Legal Ambiguity, Uncertainty, and the Management of Street Vending in New York City. Doctoral dissertation, University of California, Berkeley.

⁸Devlin. 31.

⁹See New York City Local Law 77 of 1977 and New York City Local Law 50 of 1979.

¹⁰Devlin. 60.

¹¹Mike Allen, [“Giuliani to Bar Food Vendors on 144 Blocks,”](#) New York Times, May 24, 1998.

¹²See New York State General Business Law Article 4, Section 35.

¹³See Robert Bery et. al. v. City of New York et. al.

¹⁴According to a statement by the NYPD in a letter from Mayor Adams’s administration sent to the Comptroller on the rollout of Local Law 18 of 2021, dated September 27, 2023.

¹⁵In the first two years of implementing Local Law 18, DOHMH has issued the 890 vending applications that were legally required to be released. Only 342 vendors submitted their application, and DOHMH has approved all of them. The 342 vendors who now have a supervisory license can apply for a vending permit at any time—the permit authorizes use of a food cart or truck and there is no deadline to apply. As of December 2023, 108 of the 342 licensees have initiated a supervisory license permit application. Fifty of those have so far received the permit and the others are in the process of completing their applications. The remaining licensees may apply for the permit at any time.

¹⁶For additional reporting, see Arya Sundaram, [“After street vendor crackdown, Corona Plaza market is a changed place,”](#) Gothamist, September 13, 2023.

¹⁷Chen and Vilchis, “They Make Some of New York’s Best Food. They Want the Right to Sell It.”

¹⁸The following waitlists have been open in the last two years: Green Carts (five waitlists), Seasonal,



The Women's Legal Defense and Education Fund

March 20, 2025

Written Testimony Submitted on behalf of Legal Momentum Before the New York City Council Preliminary Budget Hearing – Consumer and Worker Protection

Legal Momentum, The Women's Legal Defense and Education Fund respectfully submits the following testimony on the preliminary budget for the Department of Consumer and Worker Protection for Fiscal Year 2026

For over five decades, Legal Momentum has been at the forefront of using the law to advance gender equality in all spheres of life. Since 2017, our *Women Valued* initiative has taken an intersectional approach to women's economic empowerment and workplace equality that prioritizes the unmet needs of the most underserved women. We are grateful for the City Council's partnership and this Committee's leadership in enacting pioneering legislation protecting workers, including the most vulnerable working women in New York City's lower-wage industries.

We are at a critical moment when the City must step up and invest in workplace and labor enforcement. Specifically, the City must increase the budget of the New York City Department of Consumer and Worker Protection (DCWP) to equip the Department to effectively carry out its growing mandate over a more comprehensive set of worker protection laws and to provide much needed relief at the local level in light of the rapid dismantling of federal worker protection laws.

In New York City, DCWP plays a vital role in investigating, adjudicating, and prosecuting labor and employment violations through its enforcement of vital laws like the paid sick and safe day law; prohibitions against wage theft; and industry-specific protections for fast food workers, retail workers, and delivery workers, among others. DCWP's domestic worker mediation program and paid care division also provide an invaluable resource to the City's domestic workers, a majority of whom are women of color.

However, DCWP must now carry out its mandate at the same time as the federal government is actively undercutting workplace protections. This administration has attempted to undermine workers' rights to organize and bargain collectively by illegally firing a member of the National Labor Relations Board (NLRB); it has ramped up worksite raids across the city, creating fear in our immigrant communities; and it nominated a corporate executive to lead the Occupational Safety and Health Administration (OSHA), with rollbacks to rules protecting workers expected.

In this climate, New Yorkers cannot rely on the federal government to uphold their workplace rights. We need strong NYC agencies now more than ever. Therefore, we urge the City to appropriate \$77 million for DCWP. This figure will allow the agency to both maintain current caseloads and handle an influx of cases.

If you have additional questions or need further information, please reach out to Maria McCabe, Legal Fellow, at mmccabe@legalmomentum.org.



Make the Road New York
Testimony In Support of Legal Services Funding for Low-Wage Immigrant Workers
Before the New York City Council Committee on Consumer and Worker Protection

March 19, 2025

We thank the New York City Council Committee on the Department of Consumer and Worker Protection (DCWP) for the opportunity to share about our critical work for providing vital services to low-income, immigrant, Black and Latinx workers across New York City, who face unique legal and workplace challenges due to their immigration status, especially amid anticipated heightened immigration enforcement against immigrant workers from the new federal administration.

Make the Road New York is the largest grassroots immigrant organization in New York City, with a membership of over 28,000 low-income New Yorkers. We have 25 years of experience serving New York's communities of color, immigrant and working class families, all of whom were disproportionately affected by the pandemic and its economic fallout, and now by the anti-immigrant crackdowns. In New York City and beyond, we have provided crucial legal and health survival services, while also engaging our members with community organizing, transformative education, and policy innovation.

The support of the City Council for legal services for low-wage and immigrant workers has been crucial to our work over the years and is more critical than ever in the face of horrifying anti-immigrant attacks. In FY2026 Make the Road New York will continue to provide vital services for communities of color, immigrant and working class families across New York City. Our legal team represents hundreds of workers each year to recover stolen wages, combat unlawful discrimination at work, and enforce their rights to paid sick leave. We outreach to thousands of workers across the city and educate them about their rights. Support from the City Council discretionary funding requests is essential to maintaining and deepening our impact

across the City. **We respectfully request your support in securing FY26 funding for legal services under the following initiatives:**

Low Wage Worker Support Initiative - \$362,750 in funding to MRNY will support our Workplace Justice Project, which educates low-income immigrant workers on their rights, provides direct legal services, and mobilizes them in citywide campaigns to secure just wages and improve working conditions. This is the only dedicated city funding for employment related legal services to assist low-wage and immigrant workers. As part of the Citywide Immigrant Legal Empowerment Collaborative (CILEC), we are among the few organizations that still directly engage workers with comprehensive support so they can fully understand their rights and enforce them with high quality legal representation. **We respectfully request the Council not only renew funding but increase the funding from its current level of \$2 million to \$3 million for CILEC.**

Legal Services for the Working Poor Initiative - \$165,900 in funding will support our work to provide free legal services in the areas of labor and employment, public benefits, housing, healthcare and health insurance access, immigration, domestic violence, and LGBTQ+ civil rights issues.

The strong enforcement of workers' rights protections by the Department of Consumer and Worker Protection has been essential to our work over the years to protect immigrant workers in New York City. **The City must allocate an *additional* \$5 million to the Department of Consumer and Worker Protection (DCWP) to ensure their ability to enforce key worker and consumer protections** such as Paid Sick Leave and the new minimum pay rule and protections for delivery workers, which affect the immigrant workers we serve. Without meaningful and adequately resourced enforcement, these protections are not real for immigrant workers in New York City.

Thank you for your consideration, and your steadfast support of Make the Road New York's critical work in New York City communities over the years.

Leydis Muñoz
National Domestic Workers Alliance
Written Testimony - Committee on Consumer and Worker Protection
March 19, 2005

My name is Leydis Muñoz, the Enforcement Program Manager for the National Domestic Workers Alliance in New York (NDWA NY). With experience as a nanny, I am deeply committed to advocating for domestic workers' rights. As NDWA NY Enforcement Program Manager my primary focus is helping workers recover unpaid wages while working towards the justice and dignity they deserve. Through education, advocacy, and enforcement, I aim to uplift domestic workers and improve protections for those caring for our homes and loved ones. **On behalf of NDWA NY, I strongly support the increase of funds to at least two million dollars to the New York City Department of Consumer and Worker Protection (DCWP).**

For the last decade, NDWA NY has built a strategic and effective partnership with DCWP Paid Care Division dedicated to do joint domestic workers outreach and education with accessible Know Your Rights materials and trainings. In addition, DCWP has been pivotal in enforcement of domestic workers rights in our city. In the last four years, DCWP launched a pilot project called the Mediation Program which has become a critical resource for domestic workers within New York City, the DCWP, providing fair, accessible, and effective pathway in resolving workplace disputes and for recovering unpaid wages, including unpaid sick leave and other rightful earnings. Domestic workers frequently are secluded inside homes and battle to exercise their rights. For them, DCWP's Mediation Clinic is a new innovative enforcement strategy that serves the most vulnerable group of immigrant workers rather than an expensive or scary courtroom.

Through sufficiently careful mediation, workers and employers fully engage in a voluntary process toward the goal that absolutely encourages open dialogue, mutual understanding, and particularly fair resolutions. Many domestic workers have effectively used this program for the recovery of lost wages and for securing the benefits they are entitled to, ensuring that their labor is valued and respected.

It is important to build up the DCWP budget to maintain and grow this necessary program. With increased funding, more domestic workers will be able to use mediation services and employers, with enforced labor protections and fair workplace standards being upheld across the city. I highly recommend continuing investment within the Paid Care Mediation Program so as to empower domestic workers as well as promote complete workplace justice for everyone.

Thank you members of the Committee on Consumer and Worker Protection for reading my testimony.

Testimony of Mimi Whittaker

National Employment Law Project

In Support of Extending Resources to the Department of Consumer and Worker Protection

Hearing before New York City Council

Committee on Consumer and Worker Protection

City Hall

New York, NY

March 19, 2025

Mimi Whittaker

Legal Fellow, Legal Taskforce

National Employment Law Project

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Dear Chair Menin & Members of the Committee:

My name is Mimi Whittaker, and I am a lawyer with the National Employment Law Project (NELP), a national nonprofit with more than fifty years of experience advocating for the labor and employment rights of low-wage workers. NELP works extensively at the federal, state and local levels, and has regularly advised the New York City Council on protecting workers in the city. Relevant to your consideration today, NELP has worked with many partner organizations who file claims with DCWP and with public agencies, including DCWP, in implementation of workplace laws.

I am grateful to have the opportunity today to testify in support of adequate funding for DCWP to support its enforcement capabilities.

NYC DCWP holds a critical role in protecting workers

Despite being one of the smallest city agencies, DCWP is a leader on innovative workplace policy and is a vital enforcer of the City's worker protections. With the support of the city council, DCWP has implemented laws that give rights to fast food workers, retail workers, food delivery workers, and freelancers. Since many of these laws do not carry private rights of action, workers must go to DCWP in order to enforce their rights. Thus, these significant and unique protections are the sole responsibility of DCWP to enforce.

This implementation and enforcement work requires substantial resources to be effective. At a minimum, an enforcement team must be able to issue rules and regulations, conduct thorough investigations; perform outreach and education geared to both workers and employers; resolve complaints in a timely manner from start to finish; and recover the wages owed to workers. A well-resourced investigation and enforcement team should develop programs seeking to ensure that employers comply with the law; it should also collect and analyze data to identify gaps and strategically target enforcement.

Already, DCWP has been very stretched on staff for a number of years. With just five employees, DCWP's outreach staff is responsible for hosting and attending

hundreds of events each year. Their small team of investigators enforce laws that cover millions of New Yorkers.

NYC has significantly increased new worker protections but needs more resources to enforce them.

Currently, the City Council is considering several new bills that will offer significant wins for workers – Int. 1133, Int. 1135, Int. 780, and Int. 1081. Together, the fiscal impact statements for these bills indicate that DCWP would require 25 new staffing lines including about 7 attorneys, 5 data scientists, and a variety of investigators, intake, and clerical staff. For the agency to assume the additional implementation and enforcement responsibilities, the increased staff will cost an additional \$2.5 million in DCWP's budget. A robust DCWP is critical to ensure that New York's strong workplace protections are effective.

Federal efforts to dismantle federal worker and consumer protection agencies magnify NYC DCWP's importance

DCWP's role is now more critical than ever. The Trump Administration is gutting the federal workplace agencies of their staff and their enforcement powers, meaning that unscrupulous employers will feel emboldened to disregard worker rights. Furthermore, the federal government's increased immigration enforcement at workplaces will have a chilling effect on workers, which makes all workers, regardless of their immigration status, more vulnerable to workplace abuses. Among these abuses is immigration retaliation from employers for employees' exercise of their workplace rights, an issue that DCWP oversees directly. It is vital that this City ensures that these actions will not be taken with impunity. To fill the enforcement gap, DCWP will need more investigators and attorneys to ensure that claims can be quickly and adequately addressed.

Conclusion and recommendations

NELP respectfully urges the City Council to strongly fund DCWP. Extending additional resources to DCWP would ensure that this important agency can continue its critical work in enforcing New York City's workplace protections.

Thank you for the opportunity to speak to this committee.



TESTIMONY

Preliminary Budget Hearing:

“New York City’s Worker Cooperative Business Development Initiative: Worker Cooperatives As A Strategy to Preserve and Grow NYC Small Businesses”

Presented to

New York City Council, Committee on Consumer and
Hon. Julie Menin, Chair
Weds, March 19th, 2025

Prepared By:

Evan Casper-Futterman, PhD
Northwest Bronx Community and Clergy Coalition
103 E 196th St, Bronx, NY 10468
Phone: (718) 584-0515

Good afternoon, Hon.Chairperson Julie Menin, and the distinguished members of the New York City Council Committee on Small Business. My name is Evan Casper-Futterman, and I'm the Director of Planning and Education at the Northwest Bronx Community and Clergy Coalition, a 50 year old community led organization that organizes people across generations for racial justice and economic democracy. Alongside my colleagues from the Worker Cooperative Business Development Initiative (WCBDI), I am asking NYC City Council to support our budget ask of \$5,097,082 in next year's budget.

NYC Council made history by passing the nation's first Worker Cooperative development initiative. Across the country this work has continued to grow and adapt, all based on the courage and vision of our champions on the council.

Since the inception of the *initiative we have created over 175 new cooperative businesses and approximately 1000 new jobs, that are not only providing higher hourly wages but also building wealth and assets for individuals who are overwhelmingly women and immigrants.* We have seen first hand how the initiative has served to bolster our sector, strengthening existing cooperative businesses and creating new ones.

The creation of, and support for, worker-owned businesses is strongly aligned to the mission of consumer and worker protections over which this committee has jurisdiction. In addition to building wealth and skills of ownership, worker-owned businesses of all sizes have been shown in numerous studies to have:

- Increased job security
- Lower turnover
- Higher wages
- More assets and wealth than their non-owning peers across age, gender, and race
- Greater productivity and job satisfaction

Worker ownership supports the mission of consumer and worker protection by reinforcing and encouraging high road business practices, which reduces the cost of enforcement to taxpayers and reduces the demands on the staff of the Department for Consumer and Worker Protection and other city enforcement agencies to pursue bad actors.

This is particularly true as well because of the kinds of workers and industries that the Worker Cooperative Business Development Initiative has engaged with: low wage, high-turnover industries where workers are commonly exploited and in which businesses are commonly cited for violations and illegal practices. Every dollar spent on worker-ownership, every worker-owner

created, every new worker-owned business in our city means a better life for workers, fewer bad actors in our neighborhood commercial corridors, and a better value for the public.

Thank you for the opportunity to testify. We hope that you will consider our budget priorities and recommendations during this year's budget negotiation process.



TESTIMONY

Preliminary Budget Hearing:

“New York City’s Worker Cooperative Business Development Initiative:
Worker Cooperatives- An Essential Model for Business Sustainability and Recovery”

Presented to

New York City Council hearing, Committee on Consumer Affairs and Worker Protection
Hon. Julie Menin, Chair
Friday March 19, 2025

Prepared By:

Catherine Murcek, Worker-Owner
Samamkaya Yoga Back Care & Scoliosis Collective

Samamkaya Yoga Back Care & Scoliosis Collective

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Thank you Chair Menin and Honorable Council Members of the Committee on Consumer Affairs and Worker Protection for the opportunity to testify. My name is Catherine Murcek and I am a worker-owner at Samamkaya Yoga Back Care & Scoliosis Collective and an elected member of the Advocacy Council coordinated by the NYC Network of Worker Cooperatives (NYCNoWC), a partner organization of the Worker Cooperative Business Development Initiative (WCBDI). Our community of democratic worker-run businesses is predominantly led by women and people of color, representing communities across the five boroughs and a wide array of industries from cleaning to catering, manufacturing, media, childcare, and more. Thanks to the City Council's support over the last decade, we have the largest network of cooperatives in the U.S! I am testifying today to ask you to please **continue to support the great work of WCBDI** as a crucial component of a just recovery by **enhancing their funding to \$5,097,082**. As another part of those efforts I also urge you to **ramp up efforts to regulate commercial rents** as our small business community continues to struggle and face unreasonable rent hikes and closures due to non-forgiveness of pandemic back rent. These measures will help protect consumers and workers alike by creating stability and resilience in our local economy.

My business, Samamkaya Yoga Back Care & Scoliosis Collective (www.samamkayabackcare.com), is a very special, small studio focusing on the therapeutic applications of yoga for people with a wide range of body types and ability levels, including those with Scoliosis, herniated discs, spinal fusion, and we even have an adaptive yoga class for folks with more limiting disabilities. In this way we work in support of disability justice by giving all bodies access to a yoga practice. Our business formed just over a decade ago when a group of instructors highly skilled in therapeutic yoga for back issues were feeling exploited and underappreciated at another studio and decided to start their own worker cooperative, which is, in other words, a business that is co-owned and democratically-run by its workers.

Because of the then newly-funded citywide initiative, WCBDI, the founding members were able to get legal support from NYCNoWC to form the business as an LLC cooperative with an Operating Agreement and a system for sharing profit based on the number of hours worked at the studio. One of the founders was fortunately able to provide a zero interest personal loan to the business to build out the small studio space in Chelsea to the very specific requirements of alignment-focused therapeutic yoga. In addition, through NYCNoWC's Principle 6 program the studio has over the years been able to have business cards printed for all faculty members by Radix Media cooperative. We have also been grateful to have attended a number of workshops and business coaching sessions over the years from NYCNoWC, BOCnet, and CAMBA.

Joining Samamkaya as a worker-owner nine years ago has been a truly transformative experience for me. In an industry where most yoga instructors are accustomed to being treated as Independent contractors, to be able to have a vote in decisions about the business that will affect its members was really empowering. In addition, because cooperatives are built on certain principles including concern for community, one worker one vote, and training and education for its members, it has felt incredibly rewarding to be part of a values-driven business. Cooperatives allow the freedom to get involved in different aspects of the business that one might not have thought of before; to learn and grow in new ways. And, every member has incentive for the

business to do well because every member is financially and energetically invested in the business and will do what it takes to see the business succeed.

This became even more clear for me at this time five years ago when so many non-essential businesses like mine were forced to close their doors in order to prevent further spread of COVID-19. All our members snapped into action as much as they were able, divvying up the tremendous labor of researching different platforms we might use to switch to online offerings and different grants that might be available to help keep us afloat. We completely revamped our schedule, pay, and fee structures in an equitable way that would make it easier on the studio but also for the teachers who were ineligible for unemployment; we worked together to find the best possible solution for both the business and its workers.

We were hopeful when SBS announced the Employee Retention Grant and Small Business Continuity Loan, but we were not eligible for the grant because we all work part-time and we really could not consider taking on more debt at this time since we still have a large debt from our start-up costs. Through the **Commercial Lease Assistance program (CLA)** we were able to access legal consultations with both TakeRoot Justice and Volunteers of Legal Services to advise us on our commercial lease and how we might approach negotiations with our landlord, which fortunately went well, and we hope you will continue to fund that program. Even though we were one of the fortunate few small businesses I know of to have been able to negotiate our rent, we did so on the condition that we renew our lease for another ten years, during which period our rent will gradually rise to “market rate”. Unfortunately, this makes our future remain uncertain because our numbers have not recovered to pre-pandemic levels and we have very limited opportunities for growing our classes due to the small capacity of our space. A fair and just system of **commercial rent stabilization** would allow small businesses like mine to feel secure enough to plan for the future.

Even though we experienced significant losses in revenue during the pandemic, I know that we fared better than many other yoga studio and wellness businesses--of which so many have sadly closed for good--in a large part because of our democratic structure. Other traditionally-run studios I know of reduced teachers' pay and number of classes, let go of teachers, or even closed their doors indefinitely. Because of the resiliency of the cooperative model, and because of the wonderful support offered by the WCBDI partner organizations and the cooperative ecosystem, I am more convinced than ever that cooperative businesses are a crucial component of a just economic recovery, for building a strong and resilient economy, and for protecting consumers and workers.

I urge the City council to continue **to support and build on the Worker Cooperative Business Development Initiative, enhancing its funding to \$5,097,082** so that all the incredible partner organizations involved can continue providing legal services, education, and technical assistance to our growing community of locally-driven community-focused businesses. The way that the initiative partners coordinate and collaborate with each other is groundbreaking and shows a real commitment to economic democracy within development in addition to empowering small businesses through workplace democracy. They continued uninterrupted

services throughout the pandemic and in many cases added services that were outside their original plans, like workshops to help worker owners respond to the crisis, information about available resources, and support for loan and grant applications. They also make sure that worker-owners have “a seat at the table” when making important decisions through the leadership skill building program of NYCNoWC’s Advocacy Council, which gives worker-owners the training and support they need to bring their voices to policy spaces. Furthermore, our network of WCBDI partners have and continue to serve as a much-needed support network for immigrant workers, providing **legal and technical support, know your rights trainings, and emergency support**, and they have ramped up those efforts under this current racist federal administration.

There is so much we are eager to explore with the City Council to help ensure that the workers in our small business communities aren't just surviving, but thriving. Most worker cooperatives in our community have not been able to **access affordable commercial spaces**, and we would deeply appreciate assistance with that. We have a goal of creating cooperative co-working hubs in every borough but for now, we lack the resources and capacity to make that a reality. Ideally these hubs would be developed using the **Community Land Trust** model in order to foster community control and economic democracy. Cooperatives are also eager to take on **procurement opportunities** with city agencies, but have had trouble accessing city contracts due to a variety of factors. In addition, **access to direct financing** has been a major barrier for many co-ops to access capital to start up their business or to help it grow. For now, the best option for most co-op startups is through the innovative model used by The Working World, a CDFI and a partner in the WCBDI which supports every one of its loan recipients with education and technical assistance to help them succeed, and only accepts repayment once the business is profitable, but their resources are limited and they need your support. Please refer to www.workercoop.nyc for more info about our municipal policy priorities.

Further, in coalition with and in support of other groups, I urge you to support long term community-driven efforts toward a just recovery by supporting the following. **1) Reintroduce** the former Intro 93 for **commercial rent stabilization, Draft a version A, and hold a hearing on it**. City council needs to take this very seriously in order to protect our broader small business community from future continued closures and displacement in the aftermath of the pandemic. Rents were already too high before the pandemic began, so we need long-term solutions to prevent further displacement of BIPOC- and immigrant-owned small businesses across the city. Landlords should not be allowed to quadruple a small business’s rent in order to get the highest bidder into a commercial space, but there is currently no law preventing that. A fair and just system of commercial rent stabilization would help to level the playing field, making much needed spaces more attainable for a more diverse array of small businesses, which contribute to the cultural fabric of our great city. The idea that all commercial rents are lower or more manageable post-pandemic is completely inaccurate. **2) Preserve permanent funding** for the **Commercial Lease Assistance program** in the budget. **3) Please consider a new round of grant opportunities--as opposed to loans--with expanded eligibility and language access to allow for more types of small businesses** to get back on their feet on the long road to economic recovery. **4) Fund community-based organizations engaged in merchant**

organizing and outreach to give small businesses across the city the voice they deserve. **5)** Finally, **increase accessibility to SBS services for Limited English Proficiency immigrant small business owners** by expanding language capacity within the agency.

In conclusion, democratic workplaces in our most vulnerable communities help protect against wealth extraction by building up community wealth, the capacity for community control, and by protecting jobs and wages. My cooperative community members and I urge you to continue to support **WCBDI by enhancing their funding to \$5,097,082** and build on all efforts that prioritize equity—and protect NYC's women, immigrants, and BIPOC small business workers from displacement—to ensure a just economic recovery. Thank you for your work and for reading my testimony.



Testimony to the New York City Council City Council

Committee on Consumer and Worker Protection

March 19th, 2025

Good afternoon. My name is Mohamed Attia, and I am the Managing Director of the Street Vendor Project. I would like to thank Chair Menin and the Committee for the opportunity to testify today.

The Street Vendor Project (SVP) is a membership-based organization with more than 3,000 vendor members. We strive to support street vendors across the 5 boroughs by providing direct services such as small business consultations, legal representation and access to a wide variety of resources. We also organize to build power to the vendors community across the city and ensure that their voices are heard, and they have a seat at the table when policies and rules are being developed that will impact their livelihoods. Vast majority of our members are immigrants who hail from across the globe. Given the diversity of our membership, our services are offered in 7 different languages, Arabic, Bangla, English, French, Mandarin, Spanish and Wolof, thanks to the diversity of our small team.

We respectfully request that the council considers our funding applications for this fiscal year, since SVP is almost the only entity providing education, outreach and small business services to street vendors in NYC.

I'd also like to add that street vendors are the smallest businesses in our city, who have been contributing to the local economy for centuries, providing essential services and products, paying taxes, creating jobs, and generating revenue in their communities. And for decades, they have been dealing with an inadequate system, a set of rules that criminalizes them and prevents them from thriving or surviving in our city. Starting with the lack of investment and support to these small businesses, to the lack of access to business licenses, vendors often find themselves weathering the city and the system to make ends meet and survive in the Big Apple.

A recent report released by the *Immigration Research Initiative* found that there are roughly 23,000 street vendors in our city, 96% of whom are immigrants, and vast majority of them are unlicensed businesses, thanks to the limits the city has on the number of vending permits and licenses. While there is little to no investments or resources allocated to support the vendors, the

city doesn't shy away from investing in enforcement and attacking our communities day and night, raining down fines on them, criminalizing them and keeping them trapped in poverty.

As we have seen in other cities, in Los Angeles vendors were amongst the groups targeted by deportation back in 2017, and that led to the State of California passing the **Safe Sidewalk Vending Act in 2018**, to decriminalize street vending across the State and ensure that municipalities create systems to regulate vending in an equitable manner.

As an immigrant myself and a former vendor, I know firsthand the risk and fear that vendors take every day going out to work, facing various enforcement agencies who treat them as criminals.

With the increased enforcement and criminal tickets issues to vendors, as you can see here in this article (City Limits article), vendors are becoming more vulnerable to getting in contact with ICE and face serious consequences, such as deportation. Last year alone, the Police issued more than 2,000 criminal tickets to vendors.

NYC has the opportunity to provide protection to our communities, by passing the **Street Vendor Reform Package, intros 431, 47, 408 and 24**.

A package of bills that hasn't moved forward yet, especially legislation **intro 431**, that will not only regulate the street vending industry and bring vendors into the formal economy, but it will add millions of dollars to the city's budget, according to a report issued by the *Independent Budget Office* (IBO), attached to my testimony.

We respectfully request that the Committee holds a hearing on this bill as soon as possible, so we can have a meaningful conversation about the vending system and what the city can do to ensure we have a functioning system for street vendors, not only for the vendors, but for all New Yorkers.

More than ever before, now is the time to ensure that we have a fair vending system that protects the vendors from enforcement attacks, that legalizes their businesses and invests in education, outreach and services to our smallest businesses. NYC deserves a functioning system that's predictable and enforceable.

The City Council has the authority to do that but hasn't done it yet.

We're looking forward to working with you in the near future to ensure that NYC is a safe and sanctuary city for the most vulnerable communities.

Thanks

Mohamed Attia

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FEATURED GOVERNMENT IMMIGRATION IN DEPTH INVESTIGATIONS LABOR TRANSPORTATION

NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024

BY DANIEL PARRA 23 HOURS AGO 11 MIN



The number of NYPD tickets in 2024 was five times higher than in 2019, when the police were the primary enforcers of vendor rules before the pandemic hit and the city temporarily scaled back enforcement. It's also twice as many as in 2023, when the police issued about 4,213 tickets to vendors.

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Police confiscate the goods of a street vendor near the 103 St-Corona Plaza 7 train station in Queens on Oct. 24, 2024. Photo by Adi Talwar.

A licensed and permitted street vendor in Midtown Manhattan, who has worked in the area for decades, said he received several dozen tickets from the New York City Police Department (NYPD) in 2024 – part of an aggressive crackdown on street vendors that the city began last year.

The vendor, who preferred not to be identified by name for fear of police retaliation, said that from October 2024 through the first week of March – and taking into account his management of three other food carts – he received about 160 tickets from the NYPD, including more than 20 criminal tickets this year alone.

The tickets were mostly for minor infractions, such as standing a few inches from the curb or crosswalk, explained Mohamed Attia, director of the Street Vendor Project, who served as the vendor's English translator in a conversation with City Limits.

“What's going on here? I'm doing everything I can. I'm following the law, and yet the NYPD is just coming at me and coming at me with all these little infractions and giving me a hard time, and giving my partners and my employees a hard time,” the vendor said in Arabic.

Attia said his group has heard similar stories from vendors around the city. “You don't really see the [NY]PD getting involved with any other small business enforcement,” he added.

In total, the NYPD issued 9,376 tickets to vendors in 2024, according to City Limits' analysis of the police department's quarterly reports. The majority of these summonses, 67.5 percent, were issued in the second half of last year, around the time the Midtown vendor began receiving more summonses.

The number of NYPD tickets in 2024 was five times higher than in 2019, when the police were the primary enforcers of vendor rules before the pandemic hit and the city temporarily scaled back enforcement. It's also twice as many as in 2023, when the police issued about 4,213 tickets to vendors.

Over the last few years, vendor oversight has changed hands multiple times. In 2021, then-Mayor Bill de Blasio put the Department of Consumer and Worker Protection in charge, part of his pledge to shift responsibility away from the police after years of complaints from vendors and advocates.

After Eric Adams took office, the NYPD resumed a more active role in ticketing vendors; in 2023, the mayor assigned the Department of Sanitation (DSNY) as the lead oversight agency, though the police have remained heavily involved.

At a recent City Council hearing, NYPD Commissioner Jessica Tisch said the NYPD is called upon when DSNY staff is not available.

"At the Department of Sanitation, we weren't able to cover things like weekends, nights as examples," Tish said, referring to her former role as a DSNY commissioner. "And so when that happens, we would regularly call on the NYPD to cover where DSNY staffing was either not available, or not working."

When asked about the increase in tickets last year, an NYPD spokesperson referred to other comments made by Tisch during the March 11 budget hearing, in which she stated that they act based on complaints from the public.

"I want to be very straightforward about this: quality of life enforcement is based on community complaints. It is about listening to the people in our neighborhoods who are calling 311 and pleading for someone to come and help them," she said.

While the NYPD shared data on an increase in the number of general complaints made to 311 – which grew by 106 percent from 2018 to 2024 – it did not provide data on street vendor complaints specifically, nor did it elaborate on how a general complaint can result in vending

"The paradigms that we have in New York City, around vending, are broken, and need to be addressed," Tisch said at the recent hearing. "This includes the laws, the operations, the whole thing."

With the shift to Sanitation as the primary enforcer in 2023, DSNY created the new Vending Bureau, which launched with nearly 40 employees at the time. As of November 2024, DSNY reported that it had 87 Sanitation Police officers, as well as 24 lieutenants and three inspectors, all involved in vending enforcement.

Sanitation officials have called for more stringent enforcement in the past, and during the hearing, Commissioner Tish floated the idea of expanding the DSNY police force further.

"I shouldn't even be saying this because I'm not Sanitation Commissioner, but when I was there, the Department of Sanitation was not adequately staffed to handle vending enforcement at the scale required in New York City, and that was a model that actually worked and one worth consideration of future investments," she told lawmakers.

Street vendors near the 7 train Junction Boulevard station in Queens in October 2024. Photo by Adi Talwar.

CITY

Still, like the NYPD, the DSNY also increased the number of tickets issued to vendors last year, doling out 4,144. That's more than double the 1,535 tickets the department issued in just eight months in 2023, after the city made DSNY responsible for enforcement that April.

Between Oct. 15 and Jan. 15, DSNY issued 400 summonses in the Elmhurst, North Corona and Jackson Heights neighborhoods of Queens alone as part of Operation Restore Roosevelt, in which the city cracked down on "quality of life" issues along the bust thoroughfare.

A spokesperson said the department didn't create street vending laws nor set the fines, but just enforces existing laws, adding that they focus on safety issues, items left overnight, dirty conditions, and installations blocking curbs, subway entrances, bus stops, sidewalks, or store entrances.

In addition to writing summonses, DSNY confiscates abandoned or non-compliant material from street vendors, and in 2024, there were more confiscations than tickets: 4,323 versus 4,144, respectively. The department explained that summonses are issued to a person who owns or claims the material. But a person is not always present, so confiscations sometimes occur when setups are abandoned.

In 2024, the department donated 800,000 pounds of food confiscated from street vendors and composted another 93,000 pounds, according to a spokesperson.

But street vendors and advocates say the enforcement is overly punitive, and that many vendors are unable to operate legally, since the city limits the number of licenses available to those looking to sell on the street.

"City leaders love to say New York is a City of immigrants where small businesses are the backbone of our communities," said Mohamed Attia, managing director at the Street Vendors Project, an advocacy group for city vendors. "Why then do their policies force our city's smallest businesses, street vendors, into a system of outdated, discriminatory laws, offering handcuffs and fines rather than business licensing?"

In response to complaints from vendors and advocates, the City Council passed Local Law 18 in 2021. The law was designed to both lift the decades-old cap on the number of vending permits available and undermine the underground market for those permits. However, the roll-out of new permits and licenses has been slow.

Under the law, the NYC Department of Health and Mental Hygiene is required to offer 445 applications for the new now-called "supervisory licenses" each year, starting July 1, 2022. After

process, a spokesperson from the Health Department detailed. A vendor with a supervisory license can apply for a Supervisory License permit, the second step of the process, at any time.

However, only 452 people have started the process for a permit, and 371 vendors have actually received a permit so far. City lawmakers have introduced several bills to further reform the permitting process, including one that would eventually lift the cap on licenses and another that would remove criminal penalties for vending.

Advocates say the stakes are even higher now under Donald Trump's presidency, as the federal government carries out an immigration crackdown. An estimated 95 percent of the city's vendors are immigrant New Yorkers, according to the Street Vendor Project.

"This is a moment of urgency where we need action from our elected leaders," Attia said. "Our city's policies should support our economy while uplifting our values, rather than imitating the Trump administration's cruel agenda."

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TESTIMONY IN SUPPORT OF RENEWING FUNDING TO
SUPPORT LOW-WAGE IMMIGRANT WORKERS

Testimony from Tito Sinha

TakeRoot Justice Director of Workers' Rights Practice

Citywide Immigrant Legal Empowerment Collaborative (CILEC)

New York City Council Committee on Consumer and Worker Protection

March 19, 2025

TakeRoot Justice ("TakeRoot") thanks the New York City Council Committee on Consumer and Worker Protection for the opportunity to submit this testimony on behalf of the Citywide Immigrant Legal Empowerment Collaborative ("CILEC"), a consortium of several NYC legal services providers and community-based organizations, in support of increased, robust, sustainable, and multi-year/baseline funding for the Low-Wage Worker Support initiative.

We testify on behalf of supporting immigrant workers during this time of unprecedented, dangerous attacks on the rights of immigrants to even be present and exercise constitutional rights. Low-Wage Worker Support is the only dedicated City funding that ensures that the City's low-wage and immigrant workers have redress from wage theft, sick leave violations, discrimination, retaliation and other workplace injustices. In the last few years, the funding has supported our work in representing low-wage workers with claims of sick leave violations, sick leave retaliation, and wage theft before the City's Department of Consumer and Worker Protection ("DCWP"). Because of DCWP's robust enforcement of the Earned Safe and Sick Time Act, workers have been able to receive redress for employers' denial of sick leave, retaliatory termination for taking or requesting sick leave, and failure to provide notice of rights under the law. Thus, workers have been able to recover backpay for unlawful retaliation, sick leave pay, and statutory penalties. TakeRoot has also participated in the first mediation held through DCWP's Paid Care Mediation program for domestic workers to provide workers an opportunity to achieve a fair settlement and avoid protracted litigation at OATH which would take considerable time.

Since January 2020 to date, TakeRoot has obtained approximately \$3.5 million in settlements from employers, providing much needed recovery for low-wage and immigrant

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workers who were owed such wages and entitled to be free of retaliatory and discriminatory practices from the outset. We commend DCWP's investigators and counsel for working collaboratively with us in advancing the rights of New Yorkers and believe that our work to bring claims supports the agency to better enforce the City's law and the agency's mission to protect workers' rights. However, this crucial funding has lagged behind other priorities requiring last-minute saves from workers' rights advocates and the City Council to work to renew the funding.

Rather than engaging in this yearly effort to renew this crucial funding, we respectfully request City Council to demonstrate its ongoing commitment to the City's low-wage and immigrant workers by renewing and expanding the baseline Low-Wage Worker Support for employment-related legal services funding from \$2 million to \$3 million. This expansion will stabilize the funding so low-wage and immigrant workers can continue to receive this essential advocacy through vital civil legal services and community outreach.

As part of our mission, we work with grassroots and community-based groups by providing them with legal, research and policy support. The Low-Wage Worker funding also supports us to provide employment-related community Know-Your-Rights trainings for both organizers and workers on workplace protections and avenues for remedies and relief when workplace violations occur. Failure to renew and expand this funding will have a devastating impact on low-wage and immigrant workers, leaving them without high-quality and culturally sensitive representation in their efforts to obtain economic and worker justice.

Now, more than ever in this dangerous time of attacks on immigrants' rights and on our democracy, low-wage and immigrant workers need champions from advocates such as TakeRoot Justice and our allied CILEC partners, and they need a robust enforcement agency such as DCWP. But our ability to retain and hire staff and maintain and expand crucial administrative infrastructure to continue this life-sustaining work under Low-Wage Worker Support require expanded and sustainable funding.

We thank the City Council for your continued support for low-wage and immigrant workers through this essential funding.

Thank you.

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March 21, 2025

The Legal Aid Society Testimony Regarding the Importance of the NYC Department of Consumer and Worker Protection in Protecting the Rights of Working New Yorkers

Submitted by Rebekah Cook-Mack, The Legal Aid Society

Thank you for the opportunity to present this testimony. I am a Staff Attorney in the Employment Law Unit of The Legal Aid Society.

DCWP's Office of Labor Policy & Standards is an important partner in the fight for workers' rights. It ensures that critical worker protections like Earned Safe and Sick Leave, Fair workweek, Fast Food Worker Rights, Freelance Worker Rights, and Delivery worker rights are enforced. OLPS has been a reliable and important partner to our clients. As the laws it enforces have expanded, so too must its budget. **We call on the City to increase the staff on DCWP's Workers' Rights team by 25 additional members so that it can build on its success and meet the needs of New Yorkers.**

The Legal Aid Society is the oldest and largest not-for-profit public interest law firm in the United States, working on more than 200,000 individual legal matters annually for low-income New Yorkers with civil, criminal, and juvenile rights problems. The Society also brings law reform cases that benefit all New Yorkers. The Society delivers a full range of comprehensive legal services to low-income families and individuals in the City. Our Civil Practice has local neighborhood offices in all five boroughs, along with centralized citywide law reform, employment law, immigration law, health law, homeless rights, consumer rights, and family law practices. Many of these units represent people experiencing discrimination who are impacted by the work of the Commission.

Justice in Every Borough.

The Society's Employment Law Unit represents low-wage workers in employment-related matters such as claims for violations of leave laws, unpaid wages, claims of discrimination, and unemployment insurance hearings. Our clients are overwhelmingly people of color living paycheck to paycheck. The Unit conducts litigation, outreach, and advocacy designed to assist the most vulnerable workers in New York City, among them, low-wage workers who are sexually harassed; discriminated against based on race, national origin, immigration status, pregnancy, disability, sex, sexual orientation, gender identify, age, domestic violence, or criminal background; or denied reasonable accommodations needed due to pregnancy or disabilities.

DCWP's approach to its enforcement work is uniquely impactful: it conducts workplace wide investigations of violations of earned safe and sick leave and fair workweek laws. DCWP does not wait for each worker to realize their rights have been violated, instead they proactively ensure that violations are cured, and all workers get the benefits of the laws New York City has passed. They do this promptly and they get results. The work of OLPS is widely respected and acknowledged to be effective by workers and advocates alike. My experience referring clients to DCWP has been rewarding. One of my clients, a Starbucks worker, had her hours reduced and schedule changed in violation of NYC's fair workweek law. After I referred her to DCWP, her experience with their easy intake process and prompt follow up was so impressive to her that she called and thanked me for the referral and let me know how smoothly everything had gone. DCWP should be commended for providing thoughtful and attentive service to New Yorkers. No doubt DCWP's prompt, thorough, and thoughtful enforcement actions encourage compliance with our laws. The message is clear: DCWP is enforcing the City's laws. **The City has the opportunity to invest in what works: we should do so.**

We thank the Council for its consideration of this testimony. For more information or to address concerns, please feel free to contact me at rcook-mack@legal-aid.org or [REDACTED]

[REDACTED]

Mi nombre es Ana Rodriguez soy miembro del Consejo de abogacía de las cooperativas de trabajo en la ciudad de Nueva York (NYC NoWC).

Estoy aquí porque quiero abogar por el programa de WCBDI.

Soy parte de algunas campañas para apoyar y desarrollar la justicia económico y social como por ejemplo (campana). También soy parte de la cooperativa de Niñera De Hope Well Care donde ofrecemos servicios de cuidado de niños profesionalmente a organizaciones como (nombre de organización).

Fuimos creados en el 2016 como una solución a la falta de comunidades unidas y entrenadas para poder recibir y encontrar trabajos y sueldos dignos que permitan tener a nuestras familias y vivir una vida estable. Por mi cooperativa,

El programa de WCBDI también le ha dado vida a diferentes industrias de cooperativas en la ciudad de Nueva York como por ejemplo la cooperativa de carpintería, la cooperativa para cuidar personas de la tercera edad y muchas más. Yo doy testimonio de que el mundo del cooperativismo ha venido a revolucionar y mejorar la vida de muchos inmigrantes que no tuvieron la oportunidad de recibir educación académica En nuestros países, para nosotras, las mujeres, la cultura influye mucho en las expectativas que la sociedad pone sobre nosotras y en las decisiones que podemos tomar.

Yo vengo de una generación de mujeres silenciadas, donde no teníamos la oportunidad de recibir educación académica y mucho menos de trabajar fuera de nuestros hogares. La falta de empleo nos hacía aún más vulnerables al abuso. Al llegar a este país, nos enfrentamos a la barrera del idioma, sumado a la realidad de ser mujeres y migrantes.

Gracias al cooperativismo, he podido alcanzar sueños que antes parecían imposibles. Hoy tengo un trabajo digno, independencia económica y la confianza de ser dueña de mi propio esfuerzo.

Estos servicios — son esenciales para mujeres como yo: inmigrantes, trabajadoras, que solo necesitamos una oportunidad para crecer, apoyar a nuestras familias y contribuir a nuestras comunidades.

Ha incrementado el aporte de las trabajadoras dueñas en la ciudad de Nueva York. A través del trabajo que puedo brindar y ofrecer profesionalmente, hacemos posible que un doctor cirujano pueda ir a realizar su cirugía sin preocuparse por dónde o con quién dejar el cuidado infantil de sus hijos.

No solamente un cirujano: también un senador, un maestro, un abogado y cualquier profesional que ejerce una labor importante.

Y, sobre todo, tenemos el orgullo y el placer de poder ayudar a nuestros vecinos y vecinas, permitiéndoles trabajar con libertad, tranquilidad y sin preocupación por el cuidado de sus hijos.

Le doy gracias por las muchas oportunidades que se nos ofrecen a través de WCBDI para mejorar nuestras cooperativas. Por ejemplo, poder participar en la educación que recibimos sobre el manejo de negocios y el cooperativismo hace posible que aquellas personas que desean crear su propia empresa junto a sus socios lo puedan lograr.

Tenemos fe en que ustedes seguirán asegurando que personas como yo, con deseos de superarnos, tengamos el apoyo necesario y las herramientas adecuadas para dar vida a nuestras propias cooperativas.

Creemos firmemente que el cooperativismo es el futuro de la economía, de la equidad y de la justicia, y que representa un camino real hacia el crecimiento económico para los trabajadores dueños de cooperativas. De esta manera, también formamos parte del fortalecimiento y desarrollo económico de la ciudad de Nueva York

¡Contamos con ustedes!

Gracias

Buenas tardes miembros del comité de Protección de los Consumidores y los Trabajadores y representantes del ayuntamiento,

Mi nombre es Clara Calvo y soy trabajadora dueña en Cooperative Home Care Associates (CHCA) y consejo de abogacía para las cooperativas de trabajo de la ciudad de Nueva York. Llegué a Estados Unidos en 1995 procedente de la República Dominicana buscando una oportunidad para mejorar mi vida y la de mis tres hijos. Durante cinco años, trabajé varios trabajos en empresas tradicionales – donde trabajé largas horas, en horarios impredecibles y en entornos de trabajo difícil, mientras que ganaba muy poco dinero para subsistir. En 2001, encontré Cooperative Home Care Associates (CHCA), una empresa en el Bronx que forma y emplea a cuidadores a domicilio. Me inscribí en el programa de formación gratuito de cuatro semanas y, tras completarlo con éxito, me contrataron en la cooperativa.

Poco después de comenzar mi carrera en CHCA, me uní a la empresa como trabajadora-dueña y he formado parte de la Junta directiva de dicha cooperativa durante varios periodos. Creo que como inmigrante soy un reflejo asombroso, aproveche al máximo la oportunidad que la cooperativa me brindó y ahora estoy devolviéndole a mi comunidad lo que aprendí en estos largos años. Espero que WCBDI siga apoyando a las cooperativas y principalmente a las cooperativas de inmigrantes. Ya que el sueño de muchos inmigrantes es tener la facilidad de tener acceso a las herramientas para ser dueño de su propio negocio.

Al igual que CHCA, hay un sinnúmero de cooperativas en la ciudad de Nueva York como las de limpieza, apoyo a los ancianos, cuidado de niños y muchos servicios más que ayudan al crecimiento económico de esta ciudad. A través de los años he visto muchas empresas cerrando sus puertas por la falta de apoyo económicos. Gracias a WCBDI por que este no ha sido el caso de nosotros y por tanto le pido que por favor que nos sigan apoyando para nosotros seguir dándole el apoyo a nuestra ciudad.

Si las cooperativas crecen, y si ustedes nos apoyan, tendremos muchas más personas que podrán unirse a nuestras empresas y construir una mano de obra más segura y comprometida dándole a la ciudad de Nueva York una ventaja en su crecimiento económico. Su apoyo, y su compromiso con las cooperativas es necesario y urgente en nuestro crecimiento para que no seamos otro número en las estadísticas de pequeñas empresas que desaparecieron. Esperamos que tengan en cuenta las prioridades y recomendaciones presupuestarias de la WCBDI durante el proceso de negociación del presupuesto de este año.

Muchas gracias

Contact

Gene N. O'Neil

I am Representing ~~Street~~ ^{Neighborhood} Vendors in
Brooklyn on Worthman, Logan Ave and Aving
In Brooklyn. ZIP: 11208 Streets

We Need for the Lic's to be
be open up so more people
Can obtain them.

Lies.

Without these paper works

We are been harassed by
the Police also Sanitation
Police and all our Merchandises
Conviscated. This is very
hard for Vendors and their
families and Our livelihood.

We are Desperately asking and Pleaing To Our
Elected ^{Council} Members For your Assistans to look in this
Licesing matter we are Suffering emendy at the
moment. Begging Pleasee please For your Assistan

Now that the Weather is getting to Spring We Need
some Kind of time or Schedule to know when these Lic's
will be open so people can begin to put in Applications & pay
the fees. Thank you very much for Considering our

Plea and Concerns. G. Harwell English

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Vilda Vera Mayuga

Address: Commissioner

I represent: NYC DCWP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Kenny Minaya

Address: First Deputy Commissioner

I represent: NYC DCWP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Michael Tiger

Address: General Counsel

I represent: NYC DCWP

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: CARLOS CORTIZ

Address: Assistant Commissioner for External Affairs

I represent: NYC DCWP

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3/19/2025

(PLEASE PRINT)

Name: Mimi Whittaker

Address: 90 Broad St #1100 NY, NY 10004

I represent: National Employment Law Project

Address: 90 Broad St #1100 NY, NY 10004

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3/19/25

(PLEASE PRINT)

Name: Ben Fuller-Bragins

Address: 217 East 7th Street Brooklyn NY 11215

I represent: NYC Coalition for Domestic Work

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 3/19/25

(PLEASE PRINT)

Name: Winston Barkman Green

Address: 40 Peefar St, 9th Fl

I represent: Student Benjamin Patachyn CV

Address: SAM

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: March 19, 2025

(PLEASE PRINT)

Name: SERGEI KOYNOVSKI

Address: [REDACTED]

I represent: Street vendor project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3/19

(PLEASE PRINT)

Name: Joelae Koynovski

Address: [REDACTED]

I represent: Street Vendors Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ariel Monte

Address: [REDACTED] NY, NY, 10024

I represent: Street Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Judith Ruano

Address: [REDACTED] Bronx N.Y. 10455

I represent: Street Vendors

Address: spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 3/19/25

(PLEASE PRINT)

Name: Gene Harriott - English

Address: [REDACTED]

I represent: Street Vendors in Brooklyn

Address: Worthman Ave & Around the Area

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

Espinoza

I intend to appear and speak on Int. No. 51 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Eliazar Campos

Address: _____

I represent: Vendedor Ambulante

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Mahmoud Zaed

Address: _____

I represent: Street Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jose Yos

Address: _____

I represent: Workers Justice Project

Address: 365 Broadway, Brooklyn, NY 11201

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ligia Gualpa

Address: Workers Justice Project

I represent: 35 Broadway

Address: _____

Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3/19/2025

(PLEASE PRINT)

Name: Yanbel Rosario

Address: _____

I represent: Street Vendor Project

Address: _____

Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3-19-25

(PLEASE PRINT)

Name: Mohamed Attia

Address: _____

I represent: Street Vendor Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 471 Res. No. _____

☐ in favor ☐ in opposition

Date: 3/19/25

(PLEASE PRINT)

Name: CELESTINO FUENTES

Address: _____

I represent: SVP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3-19-25

(PLEASE PRINT)

Name: Moussa Ibrahim

Address: _____

I represent: Street Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3/19/2025

(PLEASE PRINT)

Name: Clethide

Address: _____

I represent: Street Vendor Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 3-19-85

(PLEASE PRINT)

Name: Rosario Troncoso

Address: _____

I represent: Street Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ashley Chen

Address: _____

I represent: Chinese-American Planning Council (CPC)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Luis Corres

Address: 365 Broadway, Brooklyn

I represent: Workers Justice Project

Address: 365 Broadway, Brooklyn



Please complete this card and return to the Sergeant-at-Arms

