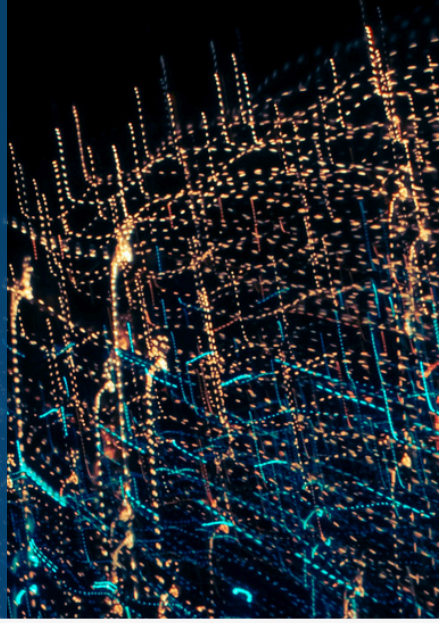
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Policy Brief

The Creation of the Public Accountability for Community Trusted AI Playbook

By Addie Achan and Rebecca Odim
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This policy project was developed by Aspen Policy Academy Fellows while participating in the 2026 Science and Technology Policy Fellowship. This policy brief provides an overview of the Fellows' proposed solution. The full project is available here. Please note that all authors' opinions published here are their own. This project was completed independently of New York City's Office of Technology and Innovation. This publication does not reflect the views of the Aspen Policy Academy, the Aspen Institute, or the New York City Office of Technology and Innovation.

Executive Summary

To proactively mitigate concerns regarding accuracy, algorithmic bias, and privacy in its artificial intelligence (AI) deployment, New York City's Office of Algorithmic Accountability (OAA) should implement the Public Accountability for Community Trusted AI (PACT AI) Playbook. This Playbook outlines a process for developing structured, tailored evaluations to audit existing deployments and serves as a guide to staffers and procurement teams' decisionmaking. Grounded in community input, the PACT AI Playbook helps translate community insights into evaluations and reports that can be shared transparently with residents. Adopting the PACT AI Playbook would allow the OAA to leverage existing infrastructure to build trust with residents by making the AI procurement process more objective, transparent, and accountable to the residents it serves.

Background

New York City is expanding its use of AI while continuing to develop its governance and oversight frameworks. Under Local Law 35 of 2022, agencies must report annually on their algorithmic tools. The 2025 reporting cycle, published in March 2026, drew a record 58 participating agencies, 19 of which disclosed a combined 86 algorithmic tools in use. These tools range from the Office of Technology and Innovation's 311 AI Smart Select app

to the Department of Youth and Community Development's chatbot, which is used over 2,000 times a day.

In 2022, the Office of Technology and Innovation began producing the Algorithmic Tools Compliance Report, creating a centralized source of information about New York City's use of algorithmic tools that supports greater transparency in the use of AI technologies. However, reporting is not always complete because of New York City's decentralized decisionmaking structure; information about vendors, risks, or risk mitigation may be missing. A follow-up audit conducted by the New York State Comptroller in August 2026 found that the city does not yet maintain a complete inventory of AI tools across agencies, has not established consistent citywide standards, and conducts risk evaluations on a "consultative or voluntary basis." The report also does not currently capture whether residents consider these uses of AI beneficial, appropriate, or aligned with community priorities.

Several recent cases have prompted changes to the way that particular tools are evaluated or used. The MyCity chatbot, which cost roughly $600,000 to build, was discontinued in January 2026 after reporting found that it provided inaccurate information, including advice that could have led businesses to violate city laws. The New York City Department of Education withdrew a proposed $1.9 million contract for an AI-powered reading tutor after concerns were raised about the tool's effectiveness and student data privacy. These cases illustrate the importance of incorporating community input before AI implementation.

New York City has already undertaken several efforts to strengthen community engagement and accountability around AI. The GUARD (Guaranteeing Unbiased AI Regulation and Disclosure) Act established the Office of Algorithmic Accountability and tasked it with auditing, monitoring, and regulating agency AI tools and investigating public complaints. The Zohran Mamdani administration also launched the Public Interest Technology Crew, which is building an online complaint portal to give residents a way to raise concerns about government technology. The New York City Council has deployed funding and begun holding listening sessions and AI 101 training across the city, supporting 22 community based organizations to run more than 100 sessions and produce multilingual materials. These efforts are creating new channels for residents to learn about and raise concerns about AI, but they have not yet been operationally integrated into procurement and deployment decisions.

Research on participatory approaches to AI governance suggests that meaningful accountability requires input from the communities affected by these systems. Researchers have cautioned that soliciting input after key decisions have already been made would simply be "checking the box" and would undermine rather than strengthen public trust. Early engagement can surface issues that policymakers and developers might not anticipate, identify concerns before deployment, and give residents a meaningful opportunity to shape how AI is used. Cities such as Long Beach and San Jose, California, have incorporated community input into their approaches to AI governance. San Jose incubated the GovAI Coalition, which has developed shared procurement templates, vendor fact sheets, and public engagement tools for more than 900 member public agencies.

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Recommendation

The OAA should implement the PACT AI Playbook, which outlines an end-to-end process to support AI procurement across the New York City government. The PACT AI Playbook process is designed to work with the city's decentralized procurement process and utilize existing assets to help the OAA identify concerns before deployment. It would allow the OAA to conduct its own evaluations, tailored to the city's needs, rather than relying solely on vendor disclosure. The Playbook directly responds to the community, enabling transparent communication and building trust. The approach laid out in the PACT AI Playbook would help close the gap between organizational metrics of harm and actual harms experienced by people and build the ongoing relationships necessary for effective accountability.

The PACT AI Playbook includes 3 main components:

1. **Facilitate community input to ensure the deployed technology's accountability to residents using the PACT AI Playbook: Part I.**

PACT AI Playbook: Part I provides guidance for the OAA to effectively coordinate stakeholders and resources to gather community input, which is instrumental in shaping and assessing AI deployments. By using the Playbook, the OAA could ensure that it is effectively collecting community input that reflects residents' concerns and build a foundation for evaluations that are responsive to concerns raised during the process. In Part I, the Playbook recommends that the city gather as much information as possible about a proposed AI tool through the AI Vendor Questionnaire, which is a standardized set of questions used to gather key information from an AI vendor about a tool that a New York City government agency is considering using. Next, the city would gather input from community members through accessible, structured channels, such as the Community Input Card, a low friction way to collect community input in residents' own words. The resulting community feedback should include residents' needs, concerns, expectations, and desired interactions and provide the data needed for evaluating the AI tool in Part II.

Governments have a responsibility to ensure that their decisions reflect community needs, making meaningful public engagement an important part of AI governance. New York City's existing community based organization sessions are a strong foundation, but a broader range of engagement methods is needed to reach New Yorkers across differences in language, ability, and digital access. This should include in-person and online community board meetings, online tools, phone calls, and text messages. Engagement should happen early enough to shape decisions, not simply validate decisions after the fact. This process would help the city better communicate how community input was considered in the decisionmaking process and build trust with New Yorkers.

2. **Conduct an audit and share community feedback using the PACT AI Playbook: Part II and Part III**.

   Building on the existing Algorithmic Tools Compliance Report, the OAA should conduct an audit focused on community highlighted risks and map these concerns to test criteria for creating evaluations. Evaluation results could then be added to the existing report for transparency. The PACT AI Playbook: Parts II and III outline how to go from qualitative community feedback to a standard dataset to a reusable evaluation and reporting. In Part II, the Playbook recommends that the city use the community input collected in Part I to create a structured evaluation measuring how well the tool meets community defined needs, run those tests against the AI tool, and produce a scorecard documenting performance against community defined

expectations. In Part III, the Playbook recommends making those results transparent by publishing the evaluation scorecard alongside the Algorithmic Tools Compliance Report and sharing the updated information with community partners.

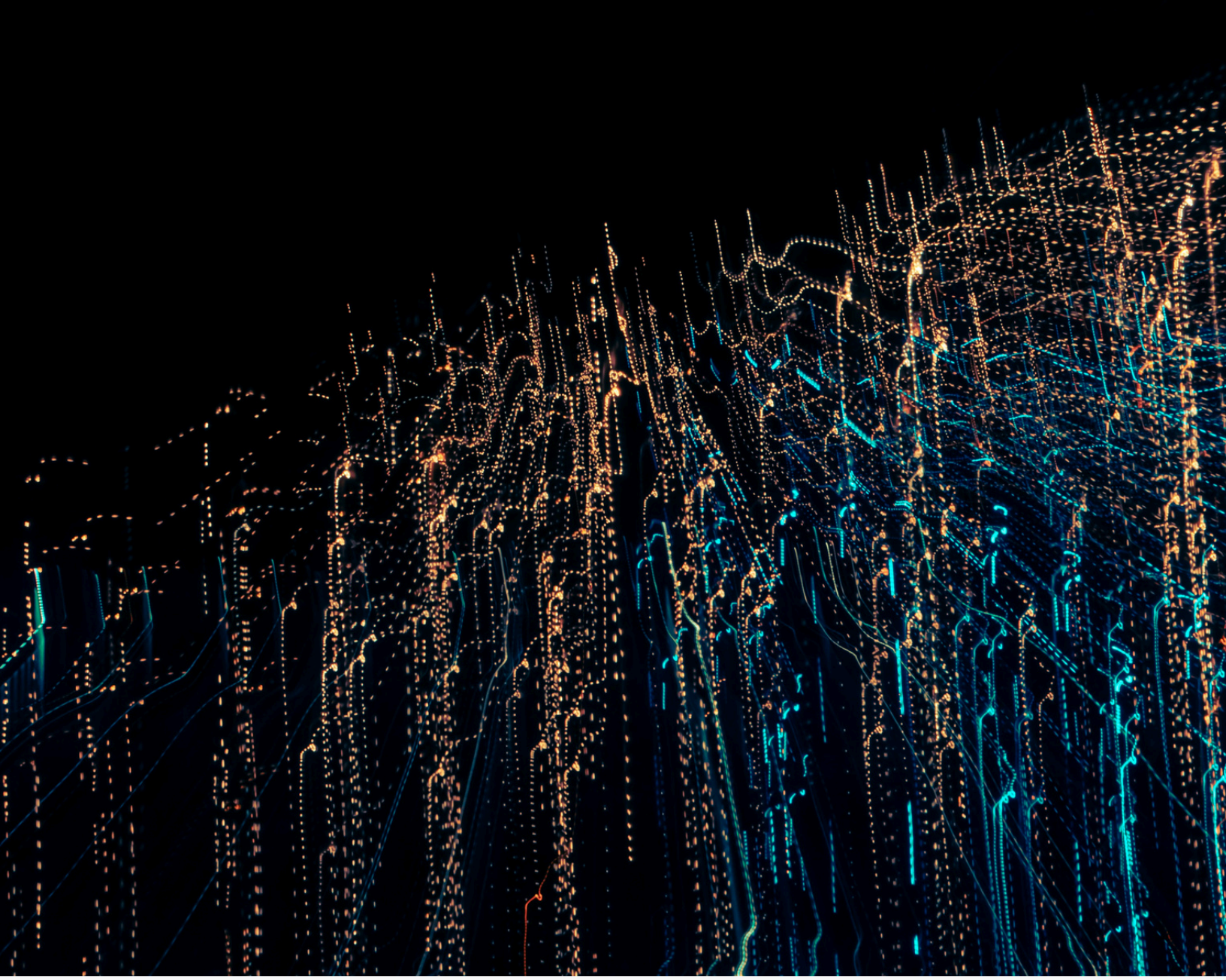
AI requires ongoing assessment because models can produce different outputs from the same input and may degrade as underlying data or operating environments change. As an industry standard for assessing AI performance, evaluations could help the OAA assess whether AI tools address known resident concerns, such as accuracy and bias, and communicate relevant results to residents.

3. **Stand up an internal resource to provide guidance to agencies when they are considering procurement of any new algorithmic tool, beginning with the AI Vendor Questionnaire.**
   To support the different levels of procurement decisions across New York City government, the OAA should provide a standard vendor questionnaire for agencies to use when adopting a new algorithmic tool that will interface with residents or residents' data, directly or indirectly through a staff member. This information should be synthesized by the OAA and used to support city staff by giving tailored guidance during the procurement process and future audits across agencies.

   The OAA could serve as the source of truth for AI procurement and assessment across New York City government by providing resources such as the AI Vendor Questionnaire, collecting and analyzing questionnaires across agencies to support evaluations and resident communication, and establishing resources such as a telephone line and email address for guidance and support.

As the OAA is established, it will need a methodology and process to achieve its stated goals. By adopting the PACT AI Playbook, the OAA would be able to adapt to this rapidly changing field in which new tools and models are emerging weekly. The Playbook could be used by applying input from the community, city experts, and industry researchers to new use cases and tools as they arise. Ultimately, this would allow for more standardized and transparent AI procurement across more than 40 New York City agencies.

If you'd like to learn more, see the full project, including the PACT AI Playbook, at aspenpolicyacademy.org/project/nyc-public-ai-accountability-2026.



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