



**New York City Council Committee on Immigration
March 14, 2022, Preliminary Budget Hearing
Testimony of Alli Finn, Senior Researcher, Immigrant Defense Project**

Thank you to Committee Chair Hanif and to the members of the committee for holding this hearing and allowing the public to comment on the budget needs and policy priorities of MOIA and Council initiatives. I’m here on behalf of the Immigrant Defense Project (IDP) to speak about the importance of maintaining the IDNYC program—and protecting it against attempts to add a smart chip or digitize its service, which would have dire consequences for immigrants and other communities. IDP is a New York-based nonprofit that works to secure fairness and justice for all immigrants by focusing on the rights of those caught at the intersections of the racially biased criminal and immigration legal systems. I’m testifying as part of IDP’s Surveillance, Tech and Immigration Policing Project, which challenges the role that technology can play in reinforcing inequity and undermining local governance.

In 2019, we testified in front of this committee, along with numerous other advocates, to express our grave concerns with a then-active proposal to add a smart chip to the IDNYC. The previous year, the de Blasio administration solicited proposals from financial firms to digitize multiple functions of the IDNYC, which would have allowed cardholders to load funds onto their IDNYC cards, make payments to private vendors, and enable “integrations with public and private partners, such as the MTA’s planned contactless fare payment system and NYC Health + Hospital medical records.”¹ IDP, and many other organizations who were key to the success of IDNYC and its implementation, spoke out against this plan, citing unacceptable risks around privacy, surveillance, and financial equity. 65 community, labor, immigrant, civil rights, legal services, and economic justice organizations signed a letter to then-Mayor de Blasio expressing united opposition to the plan.²

The current status of a plan to digitize the IDNYC is unknown, but we are deeply concerned about Mayor Adams’ campaign statements to “enhance” the IDNYC program and digitize city services. In these campaign materials about IDNYC,³ Adams stated he aims to establish “an improved MyCity platform that provides direct connection to social services through a single portal,” including SNAP and other city services and benefits. The campaign materials also stated he would pursue a “chip-enabled City ID” for residents to use for interactions with city agencies and access a bank account. While the Mayor framed this plan as one of convenience and modernization, digitizing or adding a smart chip to IDNYC poses monumental risks for a wide range of New Yorkers, as advocates including IDP and the NYC Municipal ID Coalition have been saying since 2014. We encourage the Committee and Council to stand firm against any digitization of IDNYC now and in the future.

¹ <https://tech.cityofnewyork.us/wp-content/uploads/2018/06/IDNYC-Smart-Chip-RFI-1.pdf>

² <https://www.neweconomynewyork.org/resource/letter-to-mayor-bill-de-blasio-on-proposal-to-add-financial-technology-to-idnyc-cards/>; <https://www.immigrantdefenseproject.org/wp-content/uploads/10-2-19-updated-letter-re-IDNYC-1.pdf>

³ <https://web.archive.org/web/20211215222159/https://ericadams2021.net/wp-content/uploads/2021/06/510477583-WeRISE.pdf>

We also ask the city to involve stakeholders at the start of any proposal to change the IDNYC. The 2018 proposal to digitize the IDNYC was shrouded in secrecy—it moved forward in the procurement process without getting input from the very advocates who were critical partners in the development of the ID in 2014.⁴ These proposals to digitize city services, adopt data-driven technologies, and establish “smart-city” public-private partnerships have significant consequences for New Yorkers, and should not move forward to even the RFI stage without adequate input from key stakeholders. For any proposal to digitize the IDNYC and include a financial services feature, it would be critical to get input from those stakeholders committed to financial equity and to protecting New Yorkers from all forms of policing, rather than from corporate stakeholders. The success of the IDNYC program to date is in no small part attributable to many of community-based organizations that have built trust, dispelled myths, and engaged in culturally and linguistically competent outreach to their communities.

We encourage the city to uphold the Municipal ID Coalition’s central principles that guided the implementation of the IDNYC: to protect the privacy and security of cardholders, and to provide a uniquely protected state-issued ID card for those who were vulnerable as they often faced obstacles in acquiring an ID—namely the homeless, formerly incarcerated people, gender non-conforming people, youth, and undocumented immigrants.

While its proponents claim that digital IDs solve a range of problems, in reality they raise alarming concerns around data collection and access, and have been shown to exacerbate harms to the very communities they seek to support. These dangers are well documented and include:

1. **Increasing surveillance, monitoring, policing, and data collection without consent** on Black, brown, and immigrant communities already subject to discriminatory policing and invasive surveillance.
2. **Excluding residents from key city services**, which occurs especially when cities mandate that people use a digitized service in order to access benefits or resources. People with disabilities, elders, and low-income communities are often left out.
3. **Exposing governments and residents to massive data breaches** from hacks, as well as data sharing and misuse by third-party companies.
4. **Reducing needed resources for community-led initiatives and long-term urban planning, and instead channeling funds into business-led technology interventions** that make big promises, but don’t provide solutions.

We have attached our referenced 2019 letter to the Mayor, which additionally CC’d the Council, as well as key City offices and agencies which must be accountable to these concerns, including MOIA, HRA, and DCWP. The letter expressed these 65 organizations’ “united and unqualified opposition to the administration’s plan to add financial technology and a host of integrations” to IDNYC and stated *“Even if well-intended, connecting this kind of technology and data to vulnerable New Yorkers’ identification cards would expose people to serious risks -- including dangerous experimentation or misuse by current or future administrations and private vendors -- that far outweigh any potential benefits.”* We have also attached 2019 testimony from IDP Deputy Director Mizue Aizeki,⁵ which explains the dangers we highlighted today in greater

⁴ <https://www.immigrantdefenseproject.org/wp-content/uploads/smart-city-digital-id-products.pdf>

⁵ <https://www.immigrantdefenseproject.org/wp-content/uploads/IDNYC-testimony-NYC-Council-10022019.pdf>

detail. All the concerns raised in 2014 and 2019 still hold, and are now even more urgent, as the COVID pandemic has fueled further digitization of city and private services, and their risks.

As we have stated for years, we need to preserve the IDNYC as is. There is no other government-issued ID that offers the same level of protection for undocumented immigrants from potential intrusion from police, Immigration and Customs Enforcement (ICE), or other entities. Also, we should not rely on tech- solutions to serve as a quick “fix” to deep-seated problems. As IDP Deputy Director Mizue Aizeki testified in 2019, *“It is time to close the chapter on this proposed modification of the IDNYC to allow the space for the necessary stakeholders to fully engage the City’s goal of maximizing financial inclusion.”* Digitization of the IDNYC would not only risk New Yorkers’ lives and livelihoods and torpedo the founding principles of the program, but it prevents needed focus and investment in long-term, community-based solutions to systemic inequities.

During the previous presidential administration, we were acutely aware of the importance of exercising as much caution as possible to protect immigrants from surveillance and data sharing. We must remain vigilant. Tech corporations play an increasing role in supporting the work of ICE—they provide critical data and investigative services that enable the agency to target immigrants at their homes and on the street, as well as facial recognition and electronic tracking technology. We cannot get too comfortable and relax our guard. We urge the Council, as well as MOIA and other relevant Mayor’s Offices and City agencies to refuse digitization of IDNYC, and to refute claims that digitization is a needed way to cover the program’s costs or ensure its sustainability. We also cannot stress enough the critical importance of engaging community-based organizations and advocates early regarding any proposed changes to IDNYC, and at the front end of any process to digitize city services or pursue smart-city initiatives.

September 12, 2019

[Resubmitted on October 2, 2019 with additional signatories.]

Mayor Bill de Blasio
City Hall
New York, NY 10007

Dear Mayor de Blasio:

The undersigned community, labor, immigrant, civil rights, legal services, and economic justice organizations write to express our united and unqualified opposition to the administration's plan to add financial technology and a host of integrations to NYC's municipal identification (IDNYC) cards, which are held by more than 1.2 million New Yorkers.

We call on you to halt the City's pursuit of this dangerous, corporate-driven plan, which threatens to erode public confidence in IDNYC and expose cardholders -- particularly immigrant New Yorkers -- to serious privacy, surveillance, consumer protection, and other unwarranted risks. These very real risks far outweigh any purported benefits the plan would provide to New Yorkers.

Our organizations include leading members of the coalition that worked to design, promote, and help launch IDNYC in 2015. Collectively, we represent hundreds of thousands of low-income, immigrant, senior, homeless, and other New Yorkers who have benefited tremendously from IDNYC. Our opposition to the proposed IDNYC changes is rooted in our desire to protect the integrity of this vital program, and in our decades of work and expertise on privacy, consumer protection, immigration, financial services, federal surveillance, deportation and other relevant matters. Over the past year, many of our organizations have communicated our detailed concerns and steady opposition to this plan. We have participated in phone and in-person meetings with your administration, testified at a City Council IDNYC oversight hearing, submitted detailed memos, engaged community members, and consulted with national experts who have affirmed our assessments of the vast risks to which the proposal would expose the very New Yorkers that IDNYC is intended to support.

Last year, your administration began soliciting proposals from financial firms to host an EMV/RFID "smart chip" on IDNYC cards. According to the solicitation, the chip would allow cardholders to load funds onto their IDNYC cards, make payments to private vendors, and enable "integrations with public and private partners, such as the MTA's planned contactless fare payment system and NYC Health + Hospitals medical records."

If implemented, the proposed changes to IDNYC would facilitate unprecedented, wide-scale data collection about New Yorkers' travel, spending, and other activities. Indeed, administration officials have spoken publicly about their express interest in generating "big data" and revenue through IDNYC cards equipped with smart chips. Even if well-intended, connecting this kind of technology and data to vulnerable New Yorkers' identification cards would expose people to serious risks -- including dangerous experimentation or misuse by current or future administrations and private vendors -- that far outweigh any potential benefits. These risks are particularly heightened given the Trump administration's escalating attacks on immigrant communities.

The administration has asserted that an IDNYC-financial technology (fintech) partnership would “eliminate banking deserts.” This is false. Fintech companies are not banks. They do not provide branches and personnel that customers can readily access. They do not have legal obligations to reinvest in communities. And they are not subject to the strong, uniform federal regulations and consumer protections that govern banks and credit unions. Moreover, the fintech industry is notorious for data breaches and a business model that relies on the collection and sale of people’s personal data. By steering undocumented and low income New Yorkers to these entities, the City would be perpetuating, not resolving, inequality in our banking system and potentially facilitating IDNYC cardholders’ exploitation.

According to the City’s own research, IDNYC cardholders want access to actual banks and credit unions. In fact, more than 9,000 people used IDNYC successfully to open bank and credit union accounts in the program’s first year. The same research found that the top reason New Yorkers hesitated to get an IDNYC card was the concern that it was being used to monitor people. IDNYC cardholders simply are not clamoring for the type of “banking solution” that this proposal would advance. Recently, immigrant communities won passage of NYS Green Light legislation, which will allow undocumented New Yorkers to obtain driver licenses; this will go far to expand equitable and safe banking access for hundreds of thousands of New Yorkers.

The IDNYC fintech proposal is neither progressive nor effective. NYC is home to a robust landscape of nonprofit economic justice and immigrant rights activists; community reinvestment and fair lending advocates; consumer law attorneys; community development financial institutions; and many others that are eager to work with your administration to advance truly progressive solutions to bank redlining and economic inequality.

IDNYC was created for -- and must continue to prioritize the safety of -- undocumented, homeless, and other New Yorkers who, more than ever, face real privacy and surveillance risks. The proposed changes to IDNYC are antithetical to the program’s original purpose and scope, and would expose New Yorkers to unprecedented risks at a time when they can least afford to be subjects of such experimentation. For the security and stability of our communities, we call on you to ensure that this exploration comes to an end.

For further information, please feel free to contact Mizue Aizeki, Deputy Director, Immigrant Defense Project (maizeki@immigrantdefenseproject.org); Natalia Aristizabal, Co-Director of Organizing, Make the Road New York (natalia.aristizabal@maketheroadny.org); Deyanira Del Rio, Co-Director, New Economy Project (dey@neweconomynyc.org); Betsy Plum, Vice President of Policy, New York Immigration Coalition (eplum@nyic.org); or Daniel Schwarz, Privacy & Technology Strategist, New York Civil Liberties Union (dschwarz@nyclu.org).

Signed,

African Communities Together
ALIGN
Arab American Association of New York
Association for Neighborhood and Housing Development
The Black Institute
Brandworkers
Brooklyn Cooperative Federal Credit Union
Brooklyn Defender Services
Cabrini Immigrant Services of NYC, Inc.

CASA – New Settlement Apartments
Center for Family Life in Sunset Park
Chinese Progressive Association
Citizen Action - NYC
Common Cause/NY
Community Solutions
Cooper Square Community Land Trust
District Council 37
DRUM – Desis Rising Up & Moving
East Harlem-EI Barrio Community Land Trust
Families for Freedom
Frank Pasquale, author of *The Black Box Society*
Freedom to Thrive
GOLES
Green Worker Cooperatives
Housing Court Answers
Immigrant Defense Project
Inclusiv
Interfaith Center on Corporate Responsibility
Justice For Our Neighbors
LatinoJustice PRLDEF
The Legal Aid Society
Legal Services Staff Association, NOLSW/UAW 2320
Lower East Side People's Federal Credit Union
Make the Road New York
Men Talk
MinKwon Center for Community Action
Mixteca Organization, Inc.
Mobilization for Justice, Inc.
National Center for Law and Economic Justice
Neighborhood Defender Service
New Economy Project
New Immigrant Community Empowerment
New Sanctuary Coalition
New York Civil Liberties Union
New York Communities for Change
New York Immigration Coalition
New York State Youth Leadership Council
NYC Network of Worker Cooperatives
Pan-African Community Development Initiative
Peter Cicchino Youth Project of the Urban Justice Center
Queens Law Associates
Red de Pueblos Transnacionales
SEIU 32BJ
South Bronx Unite
S.T.O.P. - Surveillance Technology Oversight Project
TakeRoot Justice
UAW Region 9a New York Area CAP Council
UHAB

UnLocal, Inc.
Upturn
Violence Intervention Program, Inc.
Volunteers of Legal Service
The Working World
Worth Rises
Youth Represent

cc:

NYC Council Speaker Corey Johnson
NYC Council Member Carlos Menchaca
NYC Council Member Daniel Dromm
Commissioner Steven Banks, Human Resources Administration
Commissioner Bitta Mostofi, Mayor's Office of Immigrant Affairs
Laura Negrón, Chief Privacy Officer for the City of New York
Commissioner Lorelei Salas, Department of Consumer and Worker Protection
J. Phillip Thompson, Deputy Mayor for Strategic Initiatives



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**New York City Council Committee on Immigration
October 2, 2019 Hearing re: INT 1706
Testimony of Mizue Aizeki, Deputy Director, Immigrant Defense Project**

Int 1706 - In relation to prohibiting a smart chip from being added to New York City identity card.

Thank you to the Committee for holding this public hearing and for allowing the public the opportunity to address our deep concerns and opposition to the De Blasio administration's proposal to integrate multiple functions into the IDNYC. The Immigrant Defense Project (IDP) is a New York-based nonprofit that works to secure fairness and justice for all immigrants by focusing on the rights of those caught at the intersection of the criminal justice system and the immigration system.

IDP is part of the NYC Municipal ID Coalition that worked in 2014 with the New York City Council and the administration for a municipal ID that would ensure equal access to services and protections for all New Yorkers. A central principle of this coalition was protecting the privacy and security of cardholders, and to provide a uniquely protected state-issued ID card for those who were vulnerable as they often faced obstacles in acquiring one—namely the homeless, formerly incarcerated people, gender non-conforming people, youth and undocumented immigrants. This card would provide some protection from being brought into the precinct to those who were subject to frequent interaction with the NYPD and the City committed to not retaining the underlying documents used to acquire a card in 2016.

The administration has stated that the primary features they are exploring to be enabled by a chip is the contactless MTA fare system and to some form of access to financial services. To be clear, striving for equal and efficient access to public transportation and solutions to achieve economic justice are critical and must be explored. Once again, we are here to reiterate that the addition of these functions to the IDNYC is, clearly, not the solution.

In early January, we sent a memo to the administration and a sign on letter outlining our concerns and requesting responses to key privacy, security, and financial questions. In February, we presented testimony to this committee that covered many of the key concerns with the City's "smart chip proposal" and also submitted a narrower set of questions to the City. In April we sent an even narrower set of questions to the administration. These questions remained unanswered. Today we submit a letter signed by 65 organizations—including community, labor, immigrant, civil rights, legal services, and economic justice organizations—expressing "united and unqualified opposition to the administration's plan to add financial technology and a host of integrations to NYC's municipal identification (IDNYC) cards, which are held by more than 1.2 million New Yorkers."

I have attached my prior testimony and the January memo, and summarize some key points below:

- It remains a central principle to our vision for the IDNYC that New Yorkers and their personal information should be kept safe from discriminatory local and federal policing, as well as from surveillance.
- The tools of police and ICE surveillance, as well as the scale of the state's efforts to identify and track people, have grown immensely over the past 15 years. ICE has repeatedly made clear that NYC is a primary target for ICE policing because it has passed laws to protect people from being turned over to immigration.¹ Data collection and analysis is central to ICE's ability to identify and track immigrants. ICE relies on data gathered by a wide array of government and private sources. Increasingly, data collection and analysis is also central to the profit-driven strategy of corporations including the financial technological sector.² The increased state interest and investment in surveillance, combined with the corporate drive to collect and share data as a key source of profit, is one of our key concerns about the IDNYC smart chip proposal. ICE currently relies on a data analysis system developed by Palantir that allows the agency to quickly analyze vast quantities of data collected by private and state entities. Health insurance companies deny coverage or increase rates based on gathering "lifestyle" data.³ Globally, police regularly access smartcard data from transit usage.⁴
- Privacy and security experts that we have consulted with have highlighted a few other key concerns with this proposal: creating multiple datasets tied to the ID, narrowing the pool of IDNYC cardholders by offering and/or requiring services that are most likely to be used by people without other options makes it easier to deanonymize the data, and the "function creep"--the gradual widening of uses beyond its original stated purpose--associated with ID integrations. As stated in my February 11, 2019 testimony, examples have shown that once implemented,

¹ Beth Fertig, "ICE Complains About NY's Sanctuary Policies After Making 82 Arrests," *The Gothamist*, September 27, 2019. <https://gothamist.com/news/ice-complains-about-nys-sanctuary-city-policies-after-making-82-arrests>; Chantal da Silva, "ICE Blames New York's Sanctuary Policies For Crackdown Led to 225 Arrests," *Newsweek*, April 19, 2018. <https://www.newsweek.com/ice-blame-new-yorks-sanctuary-policies-crackdown-led-225-arrests-892533>

² <https://www.theverge.com/2018/8/30/17801880/google-mastercard-data-online-ads-offline-purchase-history-privacy>

³ Marshall Allen, "Health care insurers are vacuuming up details about you -- and it could raise your rates," *ProPublica*, April 17, 2018. https://www.propublica.org/article/health-insurers-are-vacuuming-up-details-about-you-and-it-could-raise-your-rates?utm_campaign=sprout&utm_medium=social&utm_source=facebook&utm_content=1531834045

⁴ <http://www.tfm.org.au/wp-content/uploads/2016/06/TTF-Smartcard-Ticketing-On-Public-Transport-2010.pdf>; "Personal data disclosure to police and other law enforcement agencies," March 14, 2017, <http://content.tfl.gov.uk/aac-20170314-part-1-item15-personal-data-disclosure.pdf>; <https://www.theguardian.com/government-computing-network/2012/feb/09/met-police-oyster-card-data-requests-tfl>

the ID begins to be used in an increasing range of functions which not only makes the ID a source of more and more data for both the public and private sector but also potentially forces residents to get an ID in order to access services.

We have had numerous meetings, submitted memos, presented our research that we've gathered from consulting with numerous experts, yet many of the questions we have raised with the administration about privacy, data collection, police access to this data, and how the financial inclusion will work remain unanswered. For many of these questions, we have been given no clear answer because 'this' is still in the exploratory phase, or because of procurement rules. We have received no clear answer about whether or not data will be collected. We have received no clear answer whether or not data will be collected. We have received no clear answer as to whether or not NYPD or ICE or other state or private interests would be able to access data collected by a third party vendor. We have not received a clear explanation of how any of this will work to alleviate poverty and protect privacy and security nor the role of outside vendors in shaping it.

The addition of a chip towards “financial inclusion” has repeatedly been framed by the administration as a proposal that comes out of the community, with a singular purpose of improving the lives of New Yorkers. Yet it is no secret that financial corporations like MasterCard have an interest in this proposal. Mastercard has named “financial inclusion” as a fundamental component of its strategic plan for increasing profits. A centerpiece of this includes moving towards a cashless society—with a key tactic being the integration of their services with mass transit systems, pushing their financial services into the hands of low-income people. In fact, shortly after joining the De Blasio Administration, the former CTO of New York City launched NYCx, which issued the IDNYC RFEI. Today, he works for Mastercard as the Executive Vice President of Global Cities.⁵ There he is to play a lead role “in scaling of urban tech solutions pioneered by Mastercard.”⁶

⁵ <https://www.govtech.com/people/New-York-City-CTO-Miguel-Gamino-Departs-for-Private-Sector.html>;
<https://www.linkedin.com/pulse/idnyc-gateway-financial-inclusion-all-new-yorkers-youssef-kalad>

⁶ <https://newsroom.mastercard.com/press-releases/miguel-gamino-jr-joins-mastercard-as-executive-vice-president-for-global-cities/>; Cesar Espinoza, VP for Government and Development in Latin America, MasterCard: “It is MasterCard’s global vision to go after cash. Cash is actually our biggest competitor in Latin America, cause it is like 85% of transactions that people make, at least in Latin America are cash-based...What we want is more MasterCard cards in the market, that is what we want. We are going to bring more cards into the market, using transportation as an excuse...So what we are getting in return, for the more the card is used, if it’s used in the restaurant, pharmacy, at the supermarket, that is our business model. We make money out of that transaction.” Cesar Espinoza, VP, Business Development at Mastercard, Ali Withers, “Mastercard Targets Mexico City Where Cash is King,” Bloomberg Businessweek, August 16, 2017; <https://www.bloomberg.com/news/articles/2017-08-16/mastercard-targets-mexico-city-where-cash-is-king>

Launched in 2017, a Mexico MasterCard financial inclusion initiative linked to transit has been riddled with problems. The Mastercard licensee that issues the card, Broxel, is very poorly regulated and has disastrous customer service. It freezes cash balances on the metro card above 15,000 pesos (less than 1,000 USD) and doesn't allow cardholders to transfer money until they sign a contract with the company for a "premium" account. The metro card can be used as a credit card, for which Broxel charges a real interest rate (CAT, a standardized Mex. gov't measurement) of 97%.⁷

While companies like Mastercard insist that they value privacy and financial solutions for the most economically marginalized people, a growing part of their business model is not only expanding the use of credit cards but also the collection and sharing of data.⁸ The Electronic Privacy Information Center (EPIC) filed a complaint with the U.S. Federal Trade Commission over Mastercard's data sharing agreement with Google.⁹ A MasterCard led collaboration between Microsoft, called City Possible, outlined in a white paper the key elements of an initiative that, contrary to the stated objectives of the IDNYC program, looks to integrate staggeringly large sets of consumer data compiled from MasterCard's "more than 160 million transactions every hour all over the world" to "take the byproduct of those transactions" and, "by combining insights from how consumers shop, travel, and interact with services," help governments become more "efficient and productive."¹⁰ Is this where we are leading the IDNYC program?

Because of the conflicting information that we have received, the lack of transparency surrounding this proposal, and the evident corporate motivation for this pathway, and the broad community concern, it is not possible to have confidence that the privacy, security and economic justice of New Yorkers is at the core of this proposed integration.

As I mentioned in my previous testimony, "No other municipal ID program in the U.S. has implemented the kind of technology and integration that NYC is now considering. Chicago opted for minimal data retention with their municipal ID card—in addition to not retaining any supporting documents, the system does not retain names or addresses. The transit card function to Chicago's municipal ID is completely optional, as the City

⁷ "The average, that is to say, the approximate real cost that the client will end up paying for a credit or a credit card, including interests and commissions, is 97.1% without tax. For example, if you solicit a credit of 10,000 pesos with Broxel, what the client will end up paying, in addition to the 10,000 pesos, are 9,700 extra pesos." <https://www.rindocumentos.org/reportajes/2019/05/15/creditos-vales-comerciales-y-multinivel-la-red-detras-de-las-tarjetas-del-metro/#sdfootnote4sym>

⁸ MasterCard, "City Possible: Using Data to Create New Opportunities," white paper downloadable at: <https://partners.mastercard.com/en-us/welcome-to-the-city-possible/?Channel=Quartz&Marketer=MasterCard&TestControl=0&AdCreative=Bulletin2>

⁹ Mark Bergen and Jennifer Surane, "Google and Mastercard cut a secret ad deal to track retail sales," Bloomberg, August 30, 2018, <https://www.bloomberg.com/news/articles/2018-08-30/google-and-mastercard-cut-a-secret-addeal-to-track-retail-sales>.

¹⁰ MasterCard, "City Possible: Using Data to Create New Opportunities," white paper downloadable at: <https://partners.mastercard.com/en-us/welcome-to-the-city-possible/?Channel=Quartz&Marketer=MasterCard&TestControl=0&AdCreative=Bulletin2>.

offers metro cards that are not linked to the ID. Also, Chicago decided against including a financial services function to their municipal ID due to concerns about data collection, as well as the exorbitant fees typically charged by the financial services providers.” Chicago took these steps to provide maximum protection to the rights of those for whom their municipal ID was intended for--similar to the IDNYC, some of the most vulnerable residents of their City.

What we have repeatedly urged the administration to consider and stated quite clearly in a meeting earlier this week, is that we need to preserve the IDNYC as is. There is no other government-issued ID that offers the same level of protection for undocumented immigrants from potential intrusion from police, ICE or other entities. It is time to close the chapter on this proposed modification of the IDNYC to allow the space for the necessary stakeholders to fully engage the City’s goal of maximizing financial inclusion.

I will leave it to the financial equity and economic justice experts to explore those possibilities with the administration. But from the position of an organization whose goal is to provide maximum protection for immigrants during a time of increasing hostility and the constantly growing engagement of the tech industry in the surveillance and policing state, it is clear that the correct path is not to give financial corporations more power and information on us than they already have.¹¹ In conversations with economic justice advocates, it is clear that a positive step towards financial inclusion must include fighting for banking options that are invested in the public good--and are transparent with their business strategies and handling of our data. We need an equitable consumer banking system: we need publicly-owned banks that are democratically controlled and regulated like a public utility. We need financial cooperatives that are driven by mission rather than the profit motive, and we must ensure that underbanked populations in our communities can access the services they need without fear of their data being collected to be used against them or monetized.

¹¹ Mijente, Immigrant Defense Project, and the National Immigration Project of the National Lawyers’ Guild. *Who’s Behind ICE: The Tech and Data Corporations Fueling Deportation*. October 2018
<https://mijente.net/2018/10/23/whos-behind-ice-the-tech-companies-fueling-deportations/>