

Westchester County, New York

Office of the County Executive

Michaelian Office Building, 148 Martine Avenue, White Plains, NY 10601

CONFIDENTIAL

DATE:	September 14, 2026
TO:	The Honorable County Executive, Westchester County Westchester County Attorney's Office (Required Reviewer)
FROM:	NXM Ventures Inc. d/b/a NXM-AI nakul@nxm-ai.dev nxm-ai.dev
RE:	COMPLIENT — AI-Powered Compliance & Budget Reconciliation Platform: Founding Pilot Briefing & Authorization Request
COPIES:	Commissioner of Human Resources, Westchester County (Action Required) Commissioners — Social Services, Health, Public Works (Phase 1 departments)
CLASS:	CONFIDENTIAL — For Named Recipients Only

SUBJECT: Authorization to Deploy COMPLIENT for a 90-Day Founding Pilot — Westchester County Workforce Compliance & Budget Reconciliation

1. Purpose of This Memo

This briefing memo requests formal authorization from the Westchester County Executive's Office to deploy COMPLIENT, an AI-powered compliance and budget reconciliation platform developed by NXM Ventures Inc. d/b/a NXM-AI, for a 90-day pilot program operated by the Westchester County Department of Human Resources.

COMPLIENT assists HR administrators in identifying employee documentation gaps, verifying professional and trade credentials, auditing I-9 employment eligibility records, and reconciling payroll budget line items against documentation-incomplete positions — as part of Westchester County's routine administrative compliance obligations as an employer. All findings are reviewed by the Human Resources Commissioner and the County Attorney before any action is taken.

This memo provides: a plain-language description of the platform, the pilot's scope and duration, its legal basis, its data handling architecture, the success metrics against which the pilot will be judged, the authorizations required, and the specific next steps needed from county leadership.

Westchester County is COMPLIENT's founding pilot client. The pilot is offered at no cost to the county. In exchange, NXM-AI requests permission to publish pilot outcomes in aggregate, anonymized form — subject to county review and written approval before any external use.

2. Background & Business Case

Westchester County, as a large public employer, has ongoing obligations to maintain complete and current employee documentation — including I-9 work authorization records, New York State professional licenses, trade certifications, required academic credentials, and payroll documentation. Auditing these records across departments using current manual processes is time-intensive, error-prone, and expensive.

Westchester's workforce is well suited to this pilot: it is large and multi-departmental, its compliance obligations span state licensing, federal employment verification, and grant-funded program staffing, and the county sits adjacent to NXM-AI's operational base in the New Rochelle area — which allows on-site support during the pilot period at no additional cost.

90 Pilot Duration <i>Days, three audit cycles</i>	24hr Report Turnaround <i>From upload to full report</i>	3 Phase 1 Departments <i>DSS, DOH, DPW</i>	\$0 Cost to County <i>Complimentary deployment</i>
---	--	--	--

COMPLIENT automates the data normalization, cross-reference, and budget reconciliation steps of this process, reducing a multi-week manual audit to a 24-hour automated workflow — while keeping every consequential decision in the hands of authorized human reviewers.

3. What COMPLIENT Does

COMPLIENT operates as a four-stage administrative compliance tool:

- **Stage 1 — Ingestion:** An HR Admin exports an Employee Status Report from ADP Workforce Now and uploads it to a designated, access-controlled Google Drive folder. COMPLIENT automatically ingests the file.
- **Stage 2 — Normalization:** The platform consolidates all records into a unified internal table, scores each record for documentation completeness, maps each position to its required credential set, and identifies gaps before any external query is run.
- **Stage 3 — Verification:** COMPLIENT submits authorized queries to external verification systems — E-Verify (USCIS), the NYS Education Department, and the NYS Department of Labor — using only minimum necessary identifiers. No sensitive data is transmitted, and no raw external response data is retained.
- **Stage 4 — Reconciliation & Reporting:** The platform flags payroll budget line items tied to documentation-incomplete positions, then delivers a structured compliance report to the HR Commissioner and County Attorney portal, organized by severity: fully compliant records, administrative gaps, credential flags, and escalation referrals.

“COMPLIENT surfaces documentation gaps for human review. It does not make employment determinations, issue notices, adjust budgets, or take any action without explicit authorization from the HR Commissioner and the County Attorney.”

4. Pilot Scope

Phase 1 Departments

Department	Rationale for Inclusion
Dept. of Social Services	High I-9 verification volume; mix of full-time, part-time and seasonal staff
Dept. of Health	NYS licensure requirements for clinical staff; credential verification priority
Dept. of Public Works	Trade license verification; NYS Department of Labor integration focus

Employee Population

Field	Detail
Total Employees in Scope	To be confirmed with HR — estimated 500–2,000
Departments Included	DSS, DOH, DPW (Phase 1)

Employee Types	Full-time, part-time, seasonal — active employees only
Report Source	ADP Workforce Now — HR Admin export
Data Format	Structured .xlsx — COMPLIENT standard template

In Scope

- I-9 completeness and re-verification currency audit
- NYS professional license verification (DOH clinical staff)
- Trade license verification via NYS Department of Labor (DPW staff)
- Credential-to-position mapping — do employees hold the credentials required for their role?
- Budget reconciliation — flagging line items tied to documentation-incomplete employees
- Administrative gap report — missing W-4s, incomplete payroll setup

Out of Scope

- Medical records and HIPAA-protected health information — strictly excluded
- EEO data and disability accommodations — not ingested
- Criminal background data — not queried
- Immigration enforcement — not a function of this platform
- Any action without HR Commissioner and County Attorney authorization

5. Legal Basis & Compliance Framework

All activities performed by COMPLIENT fall within Westchester County's existing legal authority as an employer:

Activity	Legal Basis
I-9 Audit	8 U.S.C. § 1324a — all employers are required to verify and maintain I-9 records. Periodic employer-initiated I-9 audits are a standard compliance practice.
Credential Verification	Westchester County may verify that employees hold credentials required for their position as a condition of employment. Scope is limited to authenticity confirmation.
Trade License Verification	NYS Department of Labor licensure requirements applicable to Public Works trades. Verification confirms active status only.
Tax Record Completeness	IRS employer requirements. Audit limited to W-4 presence and format — not tax liability investigation.
Budget Reconciliation	Westchester County's own fiscal oversight of payroll appropriations. COMPLIENT flags line items for review; it does not move, hold, or alter any funds.
Medical Data	HIPAA and ADA strictly prohibit use of medical information in this context. COMPLIENT does not ingest, process, or transmit any medical data under any circumstance.
All Escalated Findings	Any finding that may result in employment action must be reviewed and authorized by the Westchester County Attorney's Office. No automated action is taken.

The County Attorney's Office must review and authorize COMPLIENT's deployment before any data is processed. This memo is the initiation of that review, not authorization itself.

6. Data Privacy & Security Architecture

COMPLIENT is built on a privacy-safe querying model. The following protections are enforced at the system architecture level — not as policy guidelines:

- External API queries transmit only Employee ID and credential identifiers — never SSN, home address, date of birth, or medical data
- API responses are stored as status codes only (Verified / Needs Review / Flagged) — raw external data is never retained
- All employee data is isolated to Westchester County's dedicated tenant with row-level security — no data is shared across clients
- Access is role-based: HR Admin (upload only), HR Commissioner (full report), County Attorney (escalation queue only), County Executive (aggregate summary only)
- All system actions are recorded in an immutable audit log — every query, flag, and escalation is timestamped and attributed
- Raw employee data is retained only for the duration of the pilot and purged within 30 days of pilot conclusion unless the county elects to continue
- The county receives a full export of all findings and audit logs at pilot conclusion
- NXM-AI vendor staff have zero access to Westchester County employee data

7. Human Review Gates — No Automated Actions

Every consequential step in the COMPLIENT workflow requires explicit human authorization. The following gates are enforced at the application level and cannot be bypassed:

Gate	Who Authorizes	What They Decide
Section B — Administrative Gaps	HR Administrator	Whether to contact the employee, and how
Section C — Credential Flags	HR Commissioner	Whether a finding warrants escalation or employee outreach
Section D — Escalation Referrals	County Attorney	Whether legal action, external referral, or closure is appropriate
Budget Reconciliation Flags	HR Commissioner + Budget Director	Whether a flagged payroll line warrants review. COMPLIENT never alters an appropriation.
Any External Notification	County Attorney (mandatory)	All external communications are authorized solely by the County Attorney

No adverse employment action, external notification, budget adjustment, or referral of any kind may occur without Westchester County Attorney authorization. This gate is non-negotiable and is enforced at the application level.

8. What This Platform Is Not

To avoid any ambiguity, the County Executive and County Attorney should be aware of the following explicit limitations:

- COMPLIENT is not an immigration enforcement tool and does not connect to ICE, CBP, or any law enforcement database
- COMPLIENT is not authorized to make or recommend employment termination decisions
- COMPLIENT does not transmit any employee data to law enforcement agencies
- COMPLIENT does not access criminal justice databases, court records, or background check systems
- COMPLIENT does not execute budget transactions — it flags line items for human review only
- COMPLIENT does not selectively audit employees based on national origin, ethnicity, or protected class — all active employees in participating departments are included uniformly

“COMPLIENT is an administrative HR and fiscal tool. Its sole function is to surface documentation gaps and related budget exposure for review by authorized county personnel. All determinations and actions remain with Westchester County staff and legal counsel.”

Selective enforcement of this audit based on employee national origin, ethnicity, or protected class would constitute a civil rights violation. The County Attorney's Office should confirm uniform application across each participating department before the first audit cycle is launched.

9. Pilot Timeline — 90 Days

Pre-Pilot Authorization

Milestone	Timeline	Owner
County Attorney review of this memo	Week 1–2	County Attorney's Office
Authorization decision from County Executive	Week 2–3	County Executive's Office
API credential authorization (E-Verify, NYSED, NYS DOL)	Week 3–4	HR Commissioner + NXM-AI
ADP export template configured & HR Admin trained	Week 4	HR Commissioner + NXM-AI
COMPLIENT tenant provisioned & access controls configured	Week 4	NXM-AI

90-Day Pilot Execution

Timeline	Activity
Day 1	NXM-AI configures the COMPLIENT tenant for Westchester County. API credentials authorized and tested.
Day 2	HR Admin exports the Employee Status Report from ADP and uploads it to the designated Google Drive folder.
Day 2–3	COMPLIENT ingests, normalizes, and scores all records. The AI agent runs completeness and gap analysis.
Day 3–5	API cross-reference queries dispatched to E-Verify, NYSED, and NYS DOL. Status responses mapped to records.
Day 5–7	Compliance report generated and delivered to the HR Commissioner and County Attorney portal.

Day 8–30	HR team reviews findings, conducts employee outreach, and documents responses within the COMPLIENT dashboard.
Day 31–60	Second audit cycle run on updated data. Progress measured against baseline.
Day 61–90	Final audit cycle. Outcomes report prepared. Case study data collected.
Day 90	Pilot debrief with county leadership. Commercial terms presented if pilot objectives are met.

10. Pilot Success Metrics

The pilot will be judged against six defined metrics. NXM-AI will report against each at the Day 90 debrief:

Metric	Target
Report Accuracy	≥ 95% match rate between COMPLIENT findings and manual verification of a 50-record sample
Report Speed	Full compliance report delivered within 24 hours of Excel upload
I-9 Gap Detection	All I-9 completeness issues identified vs. the county's current known list
Time Savings	≥ 60% reduction in time spent on manual compliance cross-referencing
HR Satisfaction	HR Commissioner rates workflow usability ≥ 4/5 at pilot conclusion
Zero Data Incidents	No unauthorized data access, exposure, or breach events during the pilot

Case Study Deliverable

At the conclusion of the 90-day pilot, NXM-AI will produce a formal case study including time-to-report benchmarks, compliance gap findings (aggregate and anonymized), budget reconciliation value identified, and HR administrator feedback. This document will be shared with Westchester County for written approval before any external use.

11. Requested Authorizations

Westchester County leadership is requested to authorize the following, in writing, before deployment proceeds:

Authorization Checklist — Required Before Deployment
☐ County Executive authorizes the COMPLIENT 90-day founding pilot for Westchester County HR compliance audit purposes
☐ County Attorney confirms the legal basis is satisfactory and deployment may proceed
☐ HR Commissioner authorized to configure the ADP export template and designated Google Drive upload folder
☐ HR Commissioner authorized to provision E-Verify employer API credentials for COMPLIENT integration
☐ HR Commissioner authorized to provision NYSED and NYS DOL license verification API access
☐ County Attorney designee assigned to receive and review Section D escalation findings

☐ County Executive designee assigned for aggregate summary dashboard access
☐ Budget Office designee assigned to review budget reconciliation flags
☐ County approval in principle for publication of aggregate, anonymized pilot outcomes, subject to written sign-off on the final case study

12. Commercial Path After the Pilot

The pilot carries no cost and no obligation. If the pilot objectives in Section 10 are met, NXM-AI will present the following commercial terms for the county's consideration:

Option	Detail
Professional Tier	\$3,500/mo — full Westchester County deployment, all three Phase 1 integrations, unlimited reports
Expansion Option	Additional departments added at no incremental per-department charge
County Reference	Westchester County named as founding reference client (with written approval) in investor and sales materials
SLA	99.5% uptime, dedicated support contact, 4-hour response time on critical issues

Pilot-to-Commercial Timeline

Phase	Timeline
Days 1–90	Pilot program
Day 85	Commercial proposal delivered to the County Executive
Day 90	Pilot debrief and go / no-go decision
Day 91–120	Contract execution and full deployment (if approved)

13. About NXM-AI

NXM Ventures Inc. d/b/a NXM-AI is an AI automation agency based in the New Rochelle, NY area, serving local businesses and government-adjacent organizations across the CT/NY metro corridor. COMPLIENT is built on NXM-AI's production stack — Lovable, n8n, Supabase, Claude (Anthropic), Vapi, and Twilio — which has been deployed across multiple live client engagements.

NXM-AI carries no government contracting violations, no data breach history, and no pending legal matters relevant to this engagement. Vendor documentation, insurance certificates, and references are available upon request.

14. Contact & Next Steps

Field	Detail
Primary Contact	NXM Ventures Inc. d/b/a NXM-AI
Email	nakul@nxm-ai.dev
Website	nxm-ai.dev
Location	New Rochelle, NY

Requested Response	Written authorization from the County Attorney and County Executive within 15 business days
Document Classification	CONFIDENTIAL — For Named Recipients Only
Next Steps	County Attorney review → Pilot authorization → ADP template setup → API credential provisioning → Day 1 launch

Submitted by:

Authorized Representative, NXM Ventures Inc. d/b/a NXM-AI
Date: September 14, 2026

Reviewed & Authorized by the Westchester County Attorney:

Westchester County Attorney (or Designee)
Date: _____

Authorized by the Westchester County Executive:

Westchester County Executive (or Designee)
Date: _____

Acknowledged by the Commissioner of Human Resources:

Commissioner of Human Resources, Westchester County
Date: _____

COMPLIANT — Westchester County Executive Briefing Memo | NXM Ventures Inc. d/b/a NXM-AI | nxm-ai.dev

CONFIDENTIAL — v1.0 | September 14, 2026