

FORM # 3
Agency Report Template
(Revised April 2020)

INSTRUCTIONS

The Identifying Information Law requires City agencies to submit comprehensive biennial reports related to their collection, disclosure, and retention of identifying information and their privacy protection practices. Agencies should review their 2018 reports, and begin collecting any updated information as soon as possible. The agency's updated and completed Inventory Form (Form #1), together with the Routine Designation Forms (Form #2) and Forms for the Agency Privacy Officer Approval of Collections and Disclosures on a Case-by-Case Basis (Form #5), should contain a significant amount of the information necessary to complete the report. While the Law does not specify who must complete the report, the APO is best positioned to do so, with final review and approval before submission by either the agency's General Counsel, or other counsel to the agency.

Agencies should review their 2018 versions of Form #3: Agency Report Template, and using this information and any updates to this report since 2018, complete a new Form #3 for 2020. This Form must be submitted to the CPO at PrivacyOfficer@cityhall.nyc.gov. The report must also be submitted to the Mayor, at MOReports@cityhall.nyc.gov, City Council Speaker, at reports@council.nyc.gov and the Citywide Privacy Protection Committee, at NYCPrivacyCommittee@cityhall.nyc.gov. Additionally, per N.Y.C. Charter §1133(a), agencies must submit their report to the City's Department of Records and Information Services online submissions portal at <https://a860-gpp.nyc.gov> within ten days of submission to the CPO, the Mayor, the City Council Speaker, and the Citywide Privacy Protection Committee. **Agency reports must be signed by the agency head or designee prior to submission.**

NOTE: For questions requesting information about existing agency policies relating to the disclosure of identifying information, agencies should describe their specific agency policies, and may also reference the Model Citywide Protocol for Handling Third Party Requests for Information Held by City Agencies, issued as City policy in April 2017, and the Identifying Information Law Rider.

IMPORTANT NOTE

THE INFORMATION CONTAINED IN THE AGENCY REPORT WILL BE PUBLIC INFORMATION. PREPARERS OF THIS REPORT SHOULD CONSULT WITH THEIR AGENCY'S GENERAL COUNSEL OR THE CHIEF PRIVACY OFFICER REGARDING ANY QUESTIONS AS TO WHETHER THE AGENCY'S RESPONSES TO QUESTIONS IN THE REPORT ARE PROVIDED IN ACCORDANCE WITH APPLICABLE LAW AND CITY POLICY.

**THESE INSTRUCTIONS AND VERSION CONTROL INFORMATION
ON THE FOLLOWING PAGE SHOULD BE DETACHED
FROM THE REPORT BEFORE SUBMISSION**

VERSION CONTROL

Version	Description of Change	Approver	Date
2.0	Updated completion date; miscellaneous clarifying revisions.	Laura Negrón Chief Privacy Officer, City of New York	April 2020
1.0	First Version	Laura Negrón Chief Privacy Officer, City of New York	April 2018

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AGENCY REPORT
(due on or before July 31, 2020)

Agency:	New York City Department of City Planning (“DCP”)		
Agency Privacy Officer:	William Vidal, Senior Counsel		
Email:	wvidal@planning.nyc.gov	Telephone:	212-320-3378
Date of Report:	July 30, 2020		

1. Specify the type of identifying information collected or disclosed (check all that apply):	
<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Social security number (full or last 4 digits)*	<u>Work-Related Information</u> <input checked="" type="checkbox"/> Employer information <input checked="" type="checkbox"/> Employment address
<u>Biometric Information</u> <input type="checkbox"/> Fingerprints <input checked="" type="checkbox"/> Photographs	<u>Government Program Information</u> <input type="checkbox"/> Any scheduled appointments with any employee, contractor, or subcontractor <input type="checkbox"/> Any scheduled court appearances <input type="checkbox"/> Eligibility for or receipt of public assistance or City services <input checked="" type="checkbox"/> Income tax information <input checked="" type="checkbox"/> Motor vehicle information
<u>Contact Information</u> <input checked="" type="checkbox"/> Current and/or previous home addresses <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Phone number	<u>Law Enforcement Information</u> <input checked="" type="checkbox"/> Arrest record or criminal conviction <input type="checkbox"/> Date and/or time of release from custody of ACS, DOC, or NYPD <input type="checkbox"/> Information obtained from any surveillance system operated by, for the benefit of, or at the direction of the NYPD
<u>Demographic Information</u> <input type="checkbox"/> Country of origin <input checked="" type="checkbox"/> Date of birth* <input checked="" type="checkbox"/> Gender identity <input checked="" type="checkbox"/> Languages spoken <input checked="" type="checkbox"/> Marital or partnership status <input type="checkbox"/> Nationality <input checked="" type="checkbox"/> Race <input type="checkbox"/> Religion <input type="checkbox"/> Sexual orientation	<u>Technology-Related Information</u> <input checked="" type="checkbox"/> Device identifier including media access control MAC address or Internet mobile equipment identity (IMEI)* <input checked="" type="checkbox"/> GPS-based location obtained or derived from a device that can be used to track or locate an individual* <input checked="" type="checkbox"/> Internet protocol (IP) address* <input type="checkbox"/> Social media account information
<u>Status Information</u> <input type="checkbox"/> Citizenship or immigration status <input checked="" type="checkbox"/> Employment status <input type="checkbox"/> Status as victim of domestic violence or sexual assault <input type="checkbox"/> Status as crime victim or witness	
<u>Other Types of Identifying Information</u> (list below): US Census Bureau data; Covid-19 health related data; Citywide Mobility Survey data; NYC’s Taxi and Limousine Commission data; DOE student identification numbers.	
*Type of identifying information designated by the CPO (see CPO Policies & Protocols § 3.1.1).	

2. Specify the reasons why collection and retention of identifying information specified above furthers the purpose or mission of your agency.

The collection and retention of identifying information specified above is central to the agency's core operations and six strategic objectives, which are: (a) to catalyze long-term neighborhood improvement through integrated planning and targeted accompanying public investments; (b) encourage housing production, affordability, and quality; (c) promote economic development and job growth; (d) enhance resiliency and sustainability of neighborhoods; (e) ensure integrity, timeliness, and responsiveness in land use reviews; and (f) supply objective data and expertise to a broad range of planning functions and stakeholders.

As a planning agency, the majority of the data analytics required and performed is address, not individual, based. Since "identifying information" comprises information which on its own or with other information could be used to identify an individual, the agency's work on databases involving the geolocation of buildings citywide is included.

Division specific reasons for the collection, retention, and disclosure of identifying information are the following:

DCP's Borough Offices (the "Borough Offices") collect and retain identifying information as needed to carry out their responsibility to formulate borough-wide and local area plans as well as to engage the public regarding other planning initiatives.

DCP's Capital Division ("Capital") assists the New York City School Construction Authority ("SCA") assess school capacity needs throughout the City.

DCP's Environmental Assessment and Review Division ("EARD") collects, retains, and discloses identifying information for the purposes of processing the applications submitted to DCP pursuant to City Environmental Quality Review (CEQR) regulations. As part of this process, EARD collects CEQR Forms which it shares with the Mayor's Office of Environmental Coordination.

DCP's Fiscal Division ("Fiscal") collects, retains, and discloses identifying information as needed to manage the agency's contracts, accounting, and budgeting.

DCP's General Counsel's Office ("GCO") collects, retains, and discloses identifying information as needed to respond to requests for legal advice, litigation, and requests by other local, state, and federal agencies.

DCP's Human Capital Division ("HC") collects, retains, and discloses identifying information as needed to hire staff and ensure a supportive and compliant work environment.

DCP's Information Technology Division ("IT") collects, retains, and discloses identifying information as needed to provide IT services to the agency which includes database and application development; PC and network services; Citywide Geo Application Services; Enterprise Data Management; Special Projects and Web Operations.

DCP's Land Use Review Division ("LUR") collects and retains identifying information as needed to process the agency's land use applications submitted to the agency pursuant to the New York City Charter and Administrative Code.

DCP's Population Division is given access to United States Census Bureau data for a limited time as needed to analyze and disseminate demographic data. The Population Division has also been given limited access to Covid-19 related data collected by the New York City Department of Health and Mental Services to assist the City analyze transmission patterns.

DCP's Technical Review Division ("TRD") collects, retains, and discloses identifying information as needed to perform technical reviews of land use applications submitted to the agency.

DCP's Transportation Division has access to NYC's Taxi and Limousine Commission ("TLC") data to provide technical support on transportation planning issues and conduct transportation studies. The Division also has access to the annual travel survey of New York City residents, known as the Citywide Mobility Survey ("CMS") and which is administered by the New York City Department of Transportation ("DOT").

N.Y.C. Admin. Code §23-1205(a)(1)(f)

3. Describe the types of collections and disclosures classified as: (1) pre-approved as “routine,” (2) pre-approved as routine by APOs of two or more agencies, or (3) approved by the APO on a case-by-case basis. Appendix B of the 2020 Agency Guidance includes detailed examples of routine and non-routine collections and disclosures, with descriptions.

Add additional rows as needed.

Describe the Collection or Disclosure	Classification Type
<p>Fiscal collects, retains, and discloses identifying information as needed to manage the agency’s contracts, accounting, and budgeting. Identifying information is collected, retained, and disclosed for the purposes of staff reimbursements, staff registration for electronic payments through Department of Finance, vendor registration, grant claims, and bookstore purchases (under DCP operation). Information is also collected from employees to confirm that they are validly registered to drive NYC vehicles. Identifying information is further collected, retained, and disclosed from vendors, contractors, experts, or consultants so that such entities or persons may carry out their roles and responsibilities under contracts and agreements. Contract related information is disclosed to the Mayor’s Office of Contracting Services and the Mayor’s Office of Management and Budget. In order to comply with applicable local, state, and federal procurement rules, certain identifying information may be disclosed such as bidders’ and contractors’ names and contact information. Contracts contain Appendix A terms protecting identifying information.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine <input checked="" type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>HC collects, retains, and discloses identifying information as needed for it to ensure a supportive and compliant work environment for all staff with the critical functions including but not limited to EEO tracking and reporting, employment verification, recruiting and on-boarding, payroll, timekeeping, civil service reporting, record keeping, and management of the agency’s professional development programs. Identifying information relating to employees is obtained from the City’s NYCAPS and Citytime system in which all employee, history, records, and status of employment is stored. HC and the City’s Department of Citywide Administrative Services (“DCAS”) share identifying information relating to employees through these two systems. HC and the City’s Department of Investigation (DOI) also share information relating to background checks. Disciplinary hearings at the City’s Office of Administrative Trials and Hearings (OATH) and the City’s Office of Labor Relations (“OLR”) typically require that HC share identifying information as part of the discovery process. HC further shares identifying information with the City’s unions in connection with disciplinary hearings and to facilitate union contact with its membership.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine <input checked="" type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis</p>

<p>IT collects, retains, and discloses identifying information as needed for it to provide IT services to the agency. Identifying information is collected from employees in relation to employees' e-mail and internet access and in connection with assigned devices (phones, tablets, remote access etc.) used by employees in connection with their work.</p> <p>Identifying information is also collected, retained, and disclosed in relation to various City databases where DCP contributes data, including but not limited to ZAP, PLUTO, ZOLA, GOAT; in relation to the agency's Community Engagement portal; and through the agency's social media accounts.</p> <p>Identifying information is shared with the City's Department of Information Technology ("DOITT").</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input checked="" type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>Capital processes data that contains identifying information, collected by the New York City Department of Education, in order to assist the SCA assess school capacity needs throughout the City. The data processing involves geocoding enrollment data on an ongoing basis, and the data analytics involves the periodic assessment of the methodologies used to determine capacity needs. The processed data and related analyzes are only disclosed to the SCA and DOE.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input checked="" type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>LUR collects, retains, and discloses identifying information as needed to process the agency's land use applications submitted pursuant to the New York City Charter and Administrative Code.</p> <p>In addition to the identifying information contained in applications, Doing Business Forms must also be completed by any land use applicant subject to the provisions of Local Law 34 of 2007, which it shares with the Mayor's Office of Contracting Services.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input checked="" type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>EARD division collects, retains, and discloses identifying information as needed to process environmental review applications submitted pursuant to City Environmental Quality Review (CEQR) regulations. As part of this process, the division collects CEQR Forms which it shares with the Mayor's Office of Environmental Coordination.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input checked="" type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>TRD collects, retains, and discloses identifying information as needed in connection with its review of land use applications submitted to LUR. Identifying information is disclosed to the extent necessary in letters issued to the New York City Department of Buildings ("DOB") regarding agency approvals that are a precondition to the issuance of DOB permits.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input checked="" type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>The Borough Offices collect identifying information as needed to formulate borough-wide and local area plans and engage the public regarding other planning initiatives. The identifying information collected and retained is primarily contact information.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>

<p>GCO collects, retains, and discloses identifying information as needed in relation to its role as the agency’s legal advisor.</p> <p>Identifying information may be collected, retained, or disclosed in relation to litigation, FOIL requests, compliance with law enforcement activities, and in order to comply with regulatory requirements or in response to other official inquiries. For example, the United States Equal Employment Opportunity Commission, New York State Division of Human Right, and New York City Commission on Human Rights may request identifying information regarding employees to investigate allegations of discrimination.</p> <p>The City’s Department of Investigation may also request identifying information relating to its investigations. In addition, DCP may also forward identifying information including owner’s name and address information when it is made of aware of potential zoning violations that may require further investigation and enforcement action by DOB.</p>	<p><input checked="" type="checkbox"/>Pre-approved as routine</p> <p><input checked="" type="checkbox"/>Approve as routine by two or more agencies</p> <p><input type="checkbox"/>Approved by APO on a case-by-case basis</p>
<p>The Population Division is provided limited access to United States Census Bureau data in order to propose corrections to the data through a process known as the “Census Local Update of Census Address Operation.” The Census Bureau requires that individuals with access to the data adhere to confidentiality and security guidelines issued by the Census Bureau. All materials must be destroyed once DCP’s review is completed. The Population Division’s work on the census data is central to its core function of analyzing and disseminating demographic data and trends.</p> <p>In addition, the Population Division has non-routine access to demographic data collected by other City agencies in order to assist the City analyze public health emergencies and other events. For example, the Population Division is analyzing Covid-19 related data to analyze the impact of the built environment on transmissions rates. Access to data shared as part of non-routine projects is restricted and subject to confidentiality agreements. Identifying information is removed from any published data.</p>	<p><input checked="" type="checkbox"/>Pre-approved as routine</p> <p><input type="checkbox"/>Approve as routine by two or more agencies</p> <p><input checked="" type="checkbox"/>Approved by APO on a case-by-case basis</p>
<p>The Transportation Division has access to trip data collected by the TLC and DOT in order to conduct transportation research. Both the TLC and CMS data contains location-specific trip information, transportation behaviors and choices, and the socio-demographics of participants. Access to this information is necessary for the Transportation Division to provide technical support on transportation and planning issues and to conduct transportation studies.</p>	<p><input checked="" type="checkbox"/>Pre-approved as routine</p> <p><input checked="" type="checkbox"/>Approve as routine by two or more agencies</p> <p><input type="checkbox"/>Approved by APO on a case-by-case basis</p>
<p>N.Y.C. Admin. Code §23-1205(a)(1)(b)</p>	

4. If applicable, specify the types of collections and disclosures that have been approved by the Chief Privacy Officer as being “in the best interests of the City” which involve any collections and disclosures of identifying information relating to your agency.

Add additional rows as needed.

Describe Type of Collection or Disclosure

Not applicable

N.Y.C. Admin. Code §23-1202(b)(2)(b); 23-1205(a)(1)(b)

5. Describe the agency’s current policies regarding requests for disclosures from other City agencies, local public authorities or local public benefit corporations, and third parties.

DCP adheres to the First Deputy Mayor Shorris and Corporation Counsel’s January 25, 2017, memo titled, “Advisory-Request to Agencies for Information,” which requires that Federal agencies seeking access to data or records outside the normal scope of a City agency’s interaction with them be directed to Corporation Counsel.

DCP adheres to the protocols set forth in the City’s Identifying Information Law, which went into effect in June of 2018.

DCP adheres to the Citywide Privacy Protection Policies and Protocols issued by the Chief Privacy Officer of the City of New York on January 28, 2019 (the “CPO Guidance”).

DCP adheres to the Citywide Technology Policies and guidelines.

DCP adheres to the Department of Records and Information Services (DORIS) retention schedule.

DCP includes Appendix A terms (“General Provisions Governing Contracts for Consultants, Professional, Technical, Human and Client Services) in its contracts and, where applicable, OGS terms for confidentiality.

DCP adheres to the privacy requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Family and Medical Leave Act.

6. Do the above policies address access to or use of identifying information by employees, contractors, and subcontractors? Yes No

7. If YES, do such policies specify that access to such information must be necessary for the performance of their duties? Yes No

8. Describe whether the policies are implemented in a manner that minimizes such access to the greatest extent possible while furthering the purpose or mission of the agency.

For all non-routine access to identifying information, access is restricted to a subset of DCP employees and consultants, and each person with access must enter into a confidentiality agreement. Furthermore, DCP employees must first obtain approval from the APO before processing requests for identifying information. All data publicly released by DCP is also reviewed for identifying information and removed to the extent feasible.

N.Y.C. Admin. Code §§23-1205(a)(1)(c)(1), and (4)

9. Describe the agency’s current policies for handling proposals for disclosures of identifying information to other City agencies, local public authorities or local public benefit corporations, and third parties.

DCP adheres to the CPO Guidance, as well as the First Deputy Mayor Shorris and Corporation Counsel’s January 25, 2017, memo titled, “Advisory-Request to Agencies for Information,” which requires that Federal agencies seeking access to data or records outside the normal scope of a City agency’s interaction with them be directed to Corporation Counsel.

Regarding requests from other City entities, DCP first enters into a Memorandum of Understanding, which provides for compliance with the above cited protocols, and requires DCP employees and consultants to then execute confidentiality acknowledgments. This minimizes effectively the use and disclosure of identifying information.

N.Y.C. Admin. Code §23-1205(a)(1)(c)(2)

10. Describe the agency’s current policies regarding the classification of disclosures as necessitated by the existence of exigent circumstances or as routine.

DCP complies with New York City Administrative Code Section 23-1202(b)(1) (Collection) and 1202(b)(1) (Disclosure). DCP achieves compliance by periodically surveying the data use of each division within the agency. Data that contain identifying information or could lead to the potential identification of a person is then assessed as routine or non-routine pursuant to the Identifying Information Law. If identifying information is disclosed under “exigent circumstances,” information about the collection or request and disclosure is sent to the CPO as soon as practicable.

N.Y.C. Admin. Code §23-1205(a)(1)(c)(3)

11. Describe the agency’s current policies regarding which divisions and categories of employees within an agency make disclosures of identifying information following the approval of the privacy officer.

Disclosure of identifying information is limited to the following divisions within DCP: HC, Fiscal, IT, LUR, TRD, EARD, and GCO. The disclosures entail materials such as responses to a FOIL request, agencies investigating discrimination, subpoenas, administrative records relating to litigation, personnel matters, and processing of contracts and either land use or environmental applications. Routine disclosures are limited to other City agencies and do not involve third parties and are reviewed by trained employees in the above divisions. Non-routine disclosures are reviewed by GCO and the APO.

N.Y.C. Admin. Code §23-1205(a)(1)(c)(4)

12. Describe whether the agency has considered or implemented, where applicable, any alternative policies that minimize the collection, retention, and disclosure of identifying information to the greatest extent possible while furthering the purpose or mission of such agency.

Analysis of data that involves identifying information is critical to DCP performing its Charter mandate. Analyzing address-level data is necessary to pursue planning initiatives, assist other agencies policy making that involves determinations that are spatially dependent, and support the city's operational needs. When DCP publishes reports involving data analytics, the agency determines whether the underlying data has been aggregated at a sufficiently high level of geography to prevent the disclosure of actual and potential identifying information and where necessary anonymizes the underlying data. In other instances, DCP restricts access and deletes the data once the analysis is completed.

N.Y.C. Admin. Code §23-1205(a)(4)

13. Describe the agency's use of agreements for any use or disclosure of identifying information.

When local and state agencies seek the non-routine disclosure of data that may contain identifying information, DCP requires the requestor to enter into a memorandum of understanding and confidentiality agreements. Consistent with the CPO Guidance, these agreements require that the data be securely stored, limit access to the data to designated employees, and restrict the use and disclosure of the data.

Consistent with Administrative Code Section 23-1203, third parties requesting data that may contain identifying information are also required to enter into the above agreements.

N.Y.C. Admin. Code §23-1205(a)(1)(d)

14. Using the table below, specify the types of entities requesting the disclosure of identifying information or proposals for disclosures of identifying information, and for each entity, describe (1) the reasons why an agency discloses identifying information to such entity, and (2) why any such disclosures furthers the purpose or mission of such agency.

Add additional rows as needed.

Type of Entity	Description of Reason for Disclosure	Description of how disclosure furthers the purpose or mission of the agency
Mayor's Office of Contracting Services	Doing Business Forms are required by Local Law 34 of 2007 for any land use applicant.	Required for agency review of land use applications, which is the core function of the LUR Division.
DOI	Required to provide information for background and criminal history checks of new hires.	Essential to HC's role in hiring process.
DCAS	DCP personnel records including employee history, records and status of employment are managed and stored in City's NYCAPS and Citytime system as overseen by DCAS.	Essential to HC's personnel management.
OATH	Required to share discovery materials related to disciplinary hearings.	Essential to HC's personnel management.
OLR	Required to share discovery materials related to disciplinary hearings.	Essential to HC's personnel management.
Unions	Required for unions to communicate with new hires.	Essential to HC's role in connection with labor relations.
DOB	Required in connection with land use reviews and oversight.	Essential to ensure that DCP's land use decisions and approvals are correctly implemented.
DOITT	Sharing of data to administer various databases.	Essential to DCP's responsibility to engage in physical and socioeconomic planning, including provision of technical and planning information to government agencies, public officials and community boards; and the City map.

N.Y.C. Admin. Code §23-1205(a)(1)(e)

15. Describe the impact of the Identifying Information Law and other applicable laws upon your agency's practices in relation to collection, retention, and disclosure of identifying information.

The Identifying Information Law has led DCP to perform regular, comprehensive surveys of the data that the agency either collects, retains, or discloses, which has, in turn, led to a more centralized and consistent oversight within the agency of data. The Identifying Information Law has also led DCP to create a standard template for both the memoranda of understanding entered into when data is being shared among City agencies and the non-disclosure acknowledgments relied on with each initiative. Furthermore, the creation of an agency privacy officer has streamlined collaboration among City agencies by providing one clear point of contact within each agency, i.e. the Agency Privacy Officer, and standardized both the protocols and standards for sharing data.

N.Y.C. Admin. Code §23-1205(a)(2)

16. Describe the impact of the privacy policies and protocols issued by the Chief Privacy Officer, or by the Citywide Privacy Protection Committee, as applicable, upon your agency's practices in relation to the collection, retention, and disclosure of identifying information.

Based on the CPO Guidance, DCP has modified its template data sharing agreement to reflect the model language suggested in the CPO Guidance. DCP also relies on the CPO Guidance to determine whether a collection is routine and whether proposed collections that have not been pre-approved are permissible may be authorized. Lastly, DCP has consulted the CPO Guidance to comply with reporting requirements under the ILL.

N.Y.C. Admin. Code §23-1205(a)(3)

APPROVAL FOR AGENCY REPORT

Preparer of Agency Report:

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Agency Head (or designee):

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