

# FORM 3 (AGENCY REPORT)

## (Due on or before July 31, 2022)

<b>Agency:</b>	NYC Department of Social Services (DSS)/ Human Resources Administration (HRA)/ Department of Homeless Services (DHS)		
<b>Agency Privacy Officer:</b>	Lauren Friedland		
<b>Email:</b>	<a href="mailto:friedlandl@dss.nyc.gov">friedlandl@dss.nyc.gov</a>	<b>Telephone:</b>	929-221-6535
<b>Date of Report:</b>	July 29, 2022		

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)* <input checked="" type="checkbox"/> Taxpayer ID number (full or last 4 digits)*	<p><b><u>Work-Related Information</u></b></p> <input checked="" type="checkbox"/> Employer information <input checked="" type="checkbox"/> Employment address
<p><b><u>Biometric Information</u></b></p> <input checked="" type="checkbox"/> Fingerprints <input checked="" type="checkbox"/> Photographs <input type="checkbox"/> Palm and handprints* <input type="checkbox"/> Retina and iris patterns* <input type="checkbox"/> Facial geometry* <input type="checkbox"/> Gait or movement patterns* <input checked="" type="checkbox"/> Voiceprints* <input type="checkbox"/> DNA sequences*	<p><b><u>Government Program Information</u></b></p> <input checked="" type="checkbox"/> Any scheduled appointments with any employee, contractor, or subcontractor <input checked="" type="checkbox"/> Any scheduled court appearances <input checked="" 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
<p><b><u>Contact Information</u></b></p> <input checked="" type="checkbox"/> Current and/or previous home addresses <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Phone number	<p><b><u>Law Enforcement Information</u></b></p> <input checked="" type="checkbox"/> Arrest record or criminal conviction <input checked="" type="checkbox"/> Date and/or time of release from custody of ACS, DOC, or NYPD <input checked="" type="checkbox"/> Information obtained from any surveillance system operated by, for the benefit of, or at the direction of the NYPD
<p><b><u>Demographic Information</u></b></p> <input checked="" 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 checked="" type="checkbox"/> Nationality <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Religion <input checked="" type="checkbox"/> Sexual orientation	<p><b><u>Technology-Related Information</u></b></p> <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 checked="" type="checkbox"/> Social media account information
<p><b><u>Status Information</u></b></p> <input checked="" type="checkbox"/> Citizenship or immigration status <input checked="" type="checkbox"/> Employment status <input checked="" type="checkbox"/> Status as victim of domestic violence or sexual assault <input checked="" type="checkbox"/> Status as crime victim or witness	<p><b><u>Other Types of Identifying Information</u></b> (list below): Landlord Taxpayer Identification Number; Employee Identification Number (EIN); HRA Client Identification Number (CIN) and Welfare Management System Case Number; Medicaid Client Identification Number; H+H Hospital Identification Number; Health Insurance Claim Number (HIC); Medicare Beneficiary Identification Number (MBI); New York State (NYS) Automated State Support Enforcement Tracking System (ASSETS); IDNYC Number; Veteran Status; Employee LAN ID; Student ID number; Disability Status; Housing Status, Subsidy Status.</p>
<p>*Type of identifying information designated by the CPO (see CPO Policies &amp; Protocols § 3.1.1).</p>	

**2. Explain why the collection and retention of identifying information described in Question 1 furthers the purpose or mission of your agency.**

The mission of NYC Department of Social Services/Human Resources Administration/Department of Homeless Services (DSS/HRA/DHS) is to fight poverty and income inequality, prevent and address homelessness, and promote employment by providing economic support and social services to individuals and families in need.

HRA is responsible for administering various public assistance benefits and social services programs, including but not limited to: food assistance, cash assistance, emergency and ongoing rental and utility assistance, job placement and training, public health insurance, child care, adult protective services, domestic violence shelter and assistance, HIV/AIDS support services, child support enforcement, the Fair Fares NYC Program, as well as IDNYC, the City’s municipal ID card program operated by DSS. DHS provides services to address homelessness by providing shelter and other services to families with children, single adults, adult families, and domestic violence survivors seeking temporary shelter. DHS also helps clients obtain public benefits and other services to which they are entitled, including homelessness prevention services, eviction assistance, education and job placement assistance, and financial counseling. DHS also conducts extensive outreach work to encourage street homeless New Yorkers to apply for and obtain transitional and permanent housing. To ensure that these various programs and benefits are administered effectively, and that such administration complies with federal, state, and local laws and regulations, HRA and DHS collect, retain, and disclose identifying information of applicants and clients. Such collections and disclosures are necessary—and often required—in order to process applications for benefits, make eligibility determinations, provide case management services, coordinate care and services for clients, make housing and shelter placements, conduct outreach, and provide appropriate client referrals.

DSS is the integrated, administrative management structure over HRA and DHS, and is home to the various offices and divisions that perform work for, and on behalf of, both HRA and DHS. This includes the Office of Legal Affairs (OLA), Human Resources Solutions (HRS), Information Technology Services (ITS), General Support Services; the Office of Program Accountability (OPA); the Office of Program, Planning and Financial Management (OPPFM); and the Office of External Affairs. DSS collects, retains, and discloses identifying information in order to perform functions related to legal affairs, human resources, finance and budget administration, policy and planning support, and program accountability, oversight, and evaluation work.

DSS/HRA/DHS administer and oversee public assistance programs and benefits that are heavily regulated by federal and state laws and regulations. These laws and regulations impose significant requirements and restrictions on the way DSS/HRA/DHS handles identifying information, and have formed the foundation for robust agency-wide policies and practices that ensure and enhance the protection of identifying information.

N.Y.C. Admin. Code §23-1205(a)(1)(f)

3. Describe the following types of collections and disclosures: (1) pre-approved as routine, (2) pre-approved as routine by the APOs of two or more agencies, or (3) approved by the APO on a case-by-case basis. Appendix B of the Agency Guidance on the 2022 Biennial Compliance Process includes examples of routine and non-routine collections and disclosures.

Add additional rows as needed.

NYC DSS – Shared Services and Functions	
Describe the Collection or Disclosure	Classification Type
<p><b>Human Resources &amp; Related Personnel Matters.</b> DSS collects and discloses identifying information of Agency personnel to other City agencies, State and Federal oversight agencies, designated third parties, and insurance companies for human resources and other personnel-related matters, including but not limited to: new hire processing, retiree and benefits processing, equal employment opportunity matters, payroll processing, time keeping, occupational health and safety matters, and professional development. Information is also collected and disclosed, subject to applicable law, to labor organizations and personnel union representatives when such information is needed to perform duties related to employee collective bargaining representation.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>Finance, Budget &amp; Accounting.</b> DSS collects and discloses personal identifying information of clients in receipt of DSS/HRA/DHS benefits and Agency personnel to other City agencies, contracted providers, and oversight bodies for the purposes of preparing, negotiating, and monitoring the Agency’s expense, revenue, and capital budgets to ensure that the Agency remains fiscally sound. Additionally, identifying information is collected and disclosed in the course of providing payment to contracted service providers, the claiming of Federal and State reimbursement for costs incurred, the collection and recording of Medicaid recoveries, ensuring proper budgeting within Agency departments, reporting to local, state and federal agencies, including regarding staff hours worked during declared emergencies, and the provision of basic and financial accountability for DSS.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>Research &amp; Data Analytics.</b> DSS collects and discloses research data, including survey results, and interview and focus group notes, and retains agency administrative data sets for the purposes of conducting evaluation and research studies that inform agency decision-making and provide the basis for policy and programming recommendations to the Commissioner, executive staff, and program leadership. DSS also discloses administrative data sets to research firms, university-based researchers or fellows, and other related entities in response to research requests submitted in accordance with Agency procedure. While such external disclosures constitute routine disclosures, each proposal is thoroughly evaluated by the evaluation and research division and the Office of Legal Affairs for sound research techniques and applicable legal basis for disclosure prior to any release of requested information. Though identifying information is in some cases disclosed in the form of administrative datasets, resulting publications include only aggregate and/or de-identified information absent specific individual consent permitting otherwise.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>Contracts: Transactional &amp; Procurement.</b> DSS/HRA/DHS disclose identifying information to contractors, experts, or consultants who have entered into agreements with the Agency so that such entities or persons may carry out their roles and responsibilities under such agreements. Contractors, experts, or consultants include but is not limited to contracted service providers, entities performing support functions on behalf of DSS programs, other City agencies, and community-based organizations. DSS also collects certain identifying information for contracting and</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis

<p>procurement purposes, including vendor representative names, addresses, and contact information.</p>	
<p><b>Project Management &amp; Program Planning.</b> DSS collects and discloses identifying information to other City agencies and designated entities for performance and project management, as well as data reporting functions. Planning and performance management operations support the Commissioner, Mayor’s Office, other government entities, and the public by providing information on program analysis either on an ongoing basis or in response to ad hoc data requests, and by conducting intra- and interagency data matches to inform policy and program planning.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine  <input type="checkbox"/> Approve as routine by two or more agencies  <input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p><b>Oversight &amp; Reporting.</b> DSS discloses certain identifying information to federal, state, and local oversight agencies and entities in order to comply with regulations, rules, guidelines, and conditions to funding. DSS discloses information to various entities, such as the New York State Office of Temporary and Disability Assistance, the United States Department of Agriculture Food and Nutrition Services, NYS Department of Health, NYS Office of the Medicaid Inspector General, NYS Office of the Inspector General, NYC Department of Investigation, the NYC Citywide Privacy Officer, United States Department of Health and Human Services, etc., for purposes of meeting reporting requirements for government grants, reporting on benefit eligibility, verification and program administration, and for other general oversight purposes.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine  <input type="checkbox"/> Approve as routine by two or more agencies  <input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p><b>Fraud Investigations &amp; Enforcement.</b> DSS collects and discloses identifying information to law enforcement officers, District Attorney’s Offices, United States Attorney’s Offices, contracted providers, other City, State, or Federal agencies, courts, and estate administrators and beneficiaries, as appropriate, for the purposes of detecting, preventing, or recovering improper payments, detecting and preventing fraud, waste, and abuse in programs administered by HRA and DHS, and abuse by individuals in their operations and programs. Information is collected and disclosed in order to conduct investigations of individuals and groups who allegedly attempt to commit or commit fraudulent acts against social services programs, investigate and resolve potential cases of misrepresentation or program eligibility fraud, reclaim benefits overpaid to former and current recipients and discontinue the issuance of inaccurate benefits, place liens on property and/or assert claims against past or present recipients of benefits, as appropriate, and pursue recipients and providers suspected of committing Medicaid, Supplemental Nutrition Assistance Program, or Cash Assistance fraud.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine  <input type="checkbox"/> Approve as routine by two or more agencies  <input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p><b>Audits.</b> DSS discloses identifying information to federal, state, or local auditors or other entities authorized to perform audits, in compliance with applicable laws or regulations. For example, DSS may disclose identifying information in response to an inquiry from the New York State Office of Temporary Disability Assistance for conducting federally mandated quality control and case and procedure error reviews of active, closed or rejected benefits cases, or may disclose information in the course of specific program audits completed by the State or City Comptroller’s Office.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine  <input type="checkbox"/> Approve as routine by two or more agencies  <input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p><b>Fair Hearings.</b> The Fair Hearing Administration is responsible for representing the Agency in administrative hearings brought by clients who challenge decisions about their benefits. Fair Hearing activities include packet preparation and providing representation of DSS at NYS Administrative Hearings for various HRA and DHS program areas. An applicant and/or participant can request a fair hearing to appeal one or more issues affecting the receipt of benefits. Identifying information is collected and disclosed to Fair Hearing Advocates, clients and authorized representatives, third parties designated by clients or authorized representatives, courts, and opposing counsel, as appropriate and subject to applicable law, in the</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine  <input type="checkbox"/> Approve as routine by two or more agencies  <input type="checkbox"/> Approved by APO on a case-by-case basis</p>

**Identifying Information Law**

course of packet preparation, communications with authorized advocates, and representation of the Agency in the administration of fair hearings.	
<b>Litigation &amp; Court Proceedings.</b> Various litigation and counseling units within DSS provide legal counsel and litigation support to HRA and DHS program areas, representing the Agency in the Supreme, Civil, and Family Courts and in selected administrative hearings. Personal identifying information is collected and disclosed to other City agencies, clients and designated representatives, courts, and opposing counsel, as appropriate and subject to applicable law, for court matters, which may involve Article 78 proceedings, declaratory judgment actions, class action lawsuits, and guardianship, disciplinary, employment, child support/paternity, lien enforcement/recovery, and other legal proceedings. Information is also shared with the NYC Law Department in cases where the Law Department is representing the City in litigation.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Training &amp; Certification Administration/Tracking.</b> DSS collects and discloses agency personnel information to contracted training vendors in order to enroll, monitor, and track employee training progress and completion. Information may be disclosed, subject to applicable law, to appropriate agencies, entities, and/or vendors that provide training for enrollment purposes, to ensure compliance with training requirements, and for vendor compensation, as appropriate.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Subpoenas, Court Orders, &amp; Related Requests.</b> DSS discloses identifying information to law enforcement, opposing counsel, District Attorney's Offices, United States Attorney's Offices, courts, and other third parties entitled to such information in response to subpoenas and other law enforcement or administrative requests, subject to applicable law. Information is disclosed in response to such requests only where the request is accompanied by a valid written authorization or court order, or in certain circumstances, where an appropriate legal basis exists in applicable law for the particular disclosure. While such disclosures for purposes of responding to subpoenas or other related requests constitute routine disclosures in the course of agency business due to volume, each subpoena/request is thoroughly evaluated by the Office of Legal Affairs to determine sufficiency and applicable legal basis for disclosure prior to release of any requested information.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Constituent Affairs.</b> DSS collects and discloses identifying information to and from clients, advocates, elected officials, and other constituents in order to address DSS program-related inquiries and concerns. Collections and disclosures related to constituent affairs include those completed for the purposes of reducing barriers to access to services for high-need NYC populations, responding to concerns and questions via DSS hotlines and complaint units, and resolution of case inquiries and issues. Such collections and disclosures are made only pursuant to appropriate written authorization.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Records Management.</b> DSS collects and discloses identifying information to other City agencies, including the NYC Department of Records and Information Services ("DORIS") for the purposes of management, archiving, and preservation of Agency client and employee records, including email and document retention and management.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Facilities Management &amp; Emergency Response.</b> DSS collects and discloses identifying information for health and safety program coordination and facilities management purposes. Specifically, DSS discloses information to certain entities entitled to such information, including oversight agencies and bodies, in the course of reporting and responding to occupational injuries, illnesses, hospitalizations, or fatalities; investigating and providing written responses to employee health-related inquiries and complaints; liaising with external oversight agencies concerning	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis

facility safety and health matters, including DHS shelter maintenance and repair; and coordinating emergency preparedness and emergency response.	
<b>Technical Services &amp; Application Development.</b> DSS collects and retains limited identifying information for the purposes of creating, developing, testing, and enhancing the Agency’s technology infrastructure and applications for all DSS programs, including a variety of client eligibility and recertification systems, employment/work engagement services, claiming systems, and personnel systems.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Data Security Incident Responses.</b> In certain instances, it may be necessary for DSS to disclose identifying information, subject to applicable law, to appropriate agencies, entities, or persons, where it has been determined that the security or confidentiality of the information has been compromised, and such disclosure is either required by law or is reasonably necessary to assist in efforts to prevent, minimize, or remedy potential harm. Whether a disclosure of identifying information is a necessary response to a data security incident will be determined by the DSS Privacy Officer on a case-by-case basis.	<input type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input checked="" type="checkbox"/> Approved by APO on a case-by-case basis
<b>Unique Data Sharing Initiatives.</b> In rare instances, DSS/HRA/DHS may participate in a data share initiative with other City agencies or external entities that does not fit within a documented routine use or disclosure category, but that may nevertheless further the agency’s purpose or mission. Such data share proposals will be evaluated on a case-by-case basis by the DSS Privacy Officer for sound legal basis for participation and disclosure.	<input type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input checked="" type="checkbox"/> Approved by APO on a case-by-case basis
<b>NYC DHS</b>	
<b>Referrals &amp; Case Management for Street Homeless Clients.</b> DHS and its contractors and providers collect and disclose personal identifying information, including vital, demographic, and clinical information, to clients and authorized representatives, contracted service providers and vendors, and community-based organizations for the purpose of providing an array of services to individuals experiencing street homelessness to assist them to move off the street and to address mental health, substance use, and other issues. DHS contracts with nonprofit providers to operate street outreach teams, Drop-In Centers, and Safe Havens. Teams seek to move unsheltered individuals inside and connect them with transitional housing resources.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Public Safety &amp; Health: Disease Prevention and Mortality Reporting.</b> Identifying information is disclosed to appropriate federal, state, or local agencies or personnel for purposes of preventing or combating threats to public health and safety. Information is disclosed to entities including the NYC Department of Health and Mental Hygiene to assist with monitoring and controlling the spread of disease in DHS facilities and the general population, and identifying and reporting decedents known to DHS.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>DHS Program Outreach.</b> DHS and its contractors collect and disclose personal identifying information of clients to community-based organizations and other designated City partners for outreach purposes. Specifically, information is collected and disclosed in order to identify individuals who may be eligible for DHS-administered programs and other services, and to connect such individuals with the services they need, for example, DHS’s Street Homelessness Solutions Division’s efforts to connect individuals experiencing street homelessness with housing and additional services.	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Referrals &amp; Case Management for DHS Shelter Clients.</b> DHS and its contractors collect and disclose identifying information of clients for the purposes of providing an array of referral and case management services to DHS Program clients. Specifically, DHS Programs and contractors share information with contracted	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies

<p>providers, community-based organizations, authorized client representatives, and other designated entities to make referrals for a variety of resources and services, including medical, mental health, vocational rehabilitation, finance management, permanent housing, family mediation, and substance use treatment services. Identifying information is collected and disclosed in the course of providing related case management services, including assessment of service needs, development of an Independent Living Plan, monitoring and evaluation of service plans and progress, and service coordination.</p>	<input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>DHS Program &amp; Shelter Eligibility Determinations.</b> DHS, and in some cases, its contractors or subcontractors, collect and disclose identifying information to clients and authorized representatives, other contracted providers, and community-based organizations in the course of determining eligibility for temporary and emergency shelter, addressing immediate client needs, and encouraging engagement and retention in services for families with children, adult families, and single adults.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>NYC HRA</b></p>	
<p><b>HRA Program Eligibility Determinations, Enrollment, &amp; Public Benefits Processing.</b> HRA and in some cases, its contractors or subcontractors, collect and disclose identifying information to authorized client representatives, medical providers and managed care plans, community-based organizations, and other contracted vendors, as appropriate, in the course of determining eligibility, enrolling applicants, and processing applications for a number of public benefit programs, including the NYS Medicaid Program, the Supplemental Nutrition Assistance Program, the Cash Assistance Program, the WeCARE Program, Fair Fares NYC, and the IDNYC Program. HRA and/or its contractors also collect and disclose identifying information in the course of administering and determining eligibility for additional related services and programs, including Adult Protective Services; services for survivors of domestic violence; energy assistance; tenant support and legal services; job and career assistance; substance use, mental health, and other care referrals; child support services; and rental and supportive housing assistance services, among others.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>Referrals &amp; Case Management for HRA Clients.</b> HRA and its contractors collect and disclose personal identifying information of clients for the purposes of providing an array of referral and case management services to HRA Program clients. Specifically, HRA Programs and contractors share information with contracted providers, community-based organizations, authorized client representatives, and other designated entities to make referrals for a variety of resources and services, including medical, mental health, vocational rehabilitation, finance management, housing, and substance use treatment services. Identifying information is collected and disclosed in the course of providing related case management services, including assessment of service needs, development, monitoring and evaluation of service plans and progress, and service coordination.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>HRA Program Outreach.</b> HRA and its contractors collect and disclose personal identifying information of clients to community-based organizations and other designated City partners for outreach purposes. Specifically, information is collected and disclosed in order to identify individuals who may be eligible for HRA-administered programs and other services, and to connect such individuals with the services they need. Examples include HRA’s Public Engagement Unit’s GetCovered NYC initiative and the Homelessness Prevention Administration’s efforts to prevent eviction and homelessness.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p><b>Child Support Enforcement.</b> HRA collects and discloses identifying information to oversight agencies, courts, and contracted vendors, for the purpose of ensuring that</p>	<input checked="" type="checkbox"/> Pre-approved as routine

<p>NYC children receive financial support from both parents. Information is collected and disclosed in the process of assisting with locating parents, establishing paternity, establishing child support, collecting and distributing child support payments, and modifying and enforcing child support orders. Enforcement includes oversight of administrative enforcement tools, including wage garnishment and seizure of funds, and identification of appropriate cases for local or federal prosecution for non-payment of child support.</p>	<p><input type="checkbox"/> Approve as routine by two or more agencies  <input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p><b>United States Attorney's Office Request.</b> HRA disclosed certain identifying information to the United States Attorney's Office as part of an investigation related to disbursement of benefits. HRA disclosed such information pursuant to a Protective Order requiring the United States to maintain confidentiality, and restricting use to the identified investigative purposes. Prior to re-disclosing information at trial, the United States was required to obtain additional court orders.</p>	<p><input type="checkbox"/> Pre-approved as routine  <input type="checkbox"/> Approve as routine by two or more agencies  <input checked="" type="checkbox"/> Approved by APO on a case-by-case basis</p>

N.Y.C. Admin. Code §23-1205(a)(1)(b)

**4. If applicable, describe the types of collections and disclosures of identifying information involving your agency that have been approved by the Chief Privacy Officer as being in the best interests of the City.**

**Add additional rows as needed.**

**Describe Type of Collection or Disclosure**

**Emergency Housing Voucher (EHV) Program.** The Chief Privacy Officer approved the disclosure by the City's Department of Environmental Protection (DEP) of certain identifying information about sewer and water clients to DSS/HRA's Public Engagement Unit (PEU) for the limited purpose of PEU calling those utilities clients to determine if they were landlords and if so, to ask whether they were interested in leasing apartment units to Section 8 voucher holders who newly qualify for vouchers under the U.S. Department of Housing and Urban Development's EHV program. The CPO determined that such disclosures and collections of identifying information were in the best interests of the City because they broadened the City's ability to connect New Yorkers who may be eligible for affordable housing through the time limited EHV program. The information was transferred from DEP to PEU using a secure protocol. Furthermore, PEU maintained the information in a restricted manner whereby only those PEU employees who require access to the information were afforded such access, and only for the purpose described above, and not for any other purpose aside from outreach to support the EVH program.

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. Be as specific as possible.**

**NOTE: For questions 5 – 11, refer as necessary to the Model Citywide Protocol for Handling Third Party Requests for Information Held by City Agencies (on file with the Office of Information Privacy) and the Identifying Information Rider.**

DSS/HRA/DHS frequently receives routine requests for disclosures about clients in the normal course of DSS business. Such requests come from various entities, including but not limited to applicants, clients, advocates, relatives, law enforcement agencies, government agencies, non-City entities, courts, and the media.

In light of this, Agency staff are trained on privacy and confidentiality, and know that disclosures of identifying information are subject to extensive legal restrictions and per Agency policy. In general, DSS/HRA/DHS policy prohibits staff from disclosing confidential information to anyone outside of the Agency, or to any employee whose duties do not require such disclosure, without a client's written authorization. If there are questions about the validity of a client's consent, the DSS Chief Data Privacy Officer is consulted prior to any disclosure of that client's identifying information. Absent client consent, the DSS Chief Data Privacy Office is consulted prior to any disclosure.



In general, all requests that concern client information that occur in the normal course of business and relate to serving clients are routed to the DSS Office of Legal Affairs, including requests made pursuant to judicial subpoenas, authorizations, and court orders. Non-routine requests—which are request that serve a purpose unrelated to serving DSS clients or fall outside the scope of official DSS business are immediately referred to the DSS General Counsel.

DSS’s Office of Communications and Marketing has been designated as the Agency’s principal office of communication with the media and the public. No employee, except an employee designated by that office or by the Commissioner, may speak on behalf of the Agency. Any employee who receives an inquiry from the media is required to refer the inquiry to the Office of Communications.

DSS also receives numerous requests regarding research projects and studies on DSS-related topics or issues that impact DSS and its clients. Such requests are evaluated by the DSS Office of Evaluation and Research and the DSS Office of Legal Affairs for analysis and evaluation concerning client confidentiality and privacy.

<p><b>6. Do the above policies address access to or use of identifying information by employees, contractors, and subcontractors?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>7. If YES, do those policies specify that access to identifying information must be necessary to perform their duties?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>8. Describe whether the policies are implemented in a manner that minimizes access to the greatest extent possible while furthering the purpose or mission of the agency.</b></p>	<p>DSS/HRA/DHS has agency-wide policies that limit access to identifying information while also furthering the Agency’s purpose. Identifying information is stored securely on DSS servers and in DSS systems that are in compliance with NYC Department of Information Technology and Telecommunications (“DoITT”) security standards. DSS employees, contractors, and subcontractors are granted access to identifying information only to the extent that such access is required to perform assigned job functions and/or to carry out the work required pursuant to an agreement with the Agency. DSS employee requests for access to electronic systems that maintain identifying information must be routed and approved via appropriate supervisory channels and where applicable, the Office of Legal Affairs. Electronic system access is further controlled with unique user IDs and passwords, assigned user roles that impose limitations on both the functions the employee can perform and the level of data they can access. Electronic data access and use is monitored and tracked, and employees who engage in inappropriate data access and/or use are disciplined.</p> <p>The Agency also has a procedure for exiting staff. When an employee is terminated, retires, transfers, or otherwise discontinues use of electronic database, the staffer’s supervisor is required to disable the employee’s electronic account and access. Reports of disabled accounts are provided to and reviewed daily by senior staff.</p> <p>Individual programs within the Agency also implement their own access controls for their own systems and databases, whereby information is stored in sub-folders within larger databases in order to restrict staff in unrelated Agency divisions from accessing program-specific information.</p>

In cases where contractors or subcontractors are granted access to identifying information to perform their contracted activities and functions, requirements relating to confidentiality of identifying information are included in their Agency agreements that require the protection of client privacy and the security of such information. Agency agreements include specific language requiring that access to and use of identifying information by the contractor/subcontractor is explicitly limited to the purposes set forth within the agreement, as well as to those individuals who require it to carry out their job functions. Further, employees of contractors/subcontractors are generally required to execute Confidentiality Statements acknowledging their duty to maintain the confidentiality of any information accessed pursuant to the agreement and to use such information appropriately. DSS/HRA/DHS contractors and subcontractors are also subject to DSS confidentiality policies.

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. Be as specific as possible.**

Proposals for disclosures of identifying information to other City agencies, local public authorities, local public benefit corporations, and other third parties are handled similarly to requests for disclosures as described in response to Question #5 above. Additionally, if a proposal is accepted, DSS/HRA/DHS may require an agreement. Such processes are described in Question #13.

Proposals for disclosures of identifying information occurring in the normal course of Agency business are analyzed by the DSS Office of Legal Affairs and evaluated for program value and legal basis for disclosure. Proposals for disclosures of identifying information unrelated to serving the needs of DSS clients, or for purposes outside the scope of official Agency business are generally denied. When the proposal involves research or constitutes a research proposal, the request is routed to and evaluated by both the Office of Legal Affairs and the DSS Office of Evaluation and Research.

In general, because identifying information maintained by DSS/HRA/DHS is subject to robust legal confidentiality requirements and additional DSS/HRA/DHS policies requiring the protection of such information, DSS/DHS/HRA does not generally approve proposals for disclosures unless client consent/written authorization can be obtained.

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. Be as specific as possible.**

The DSS Agency Privacy Officer (“APO”) has the authority to give advance written approval for collections and disclosures of identifying information that are considered routine.

When a request or proposal is presented for a collection or disclosure that does not fall within one of the previously designated “routine” categories, DSS staff are directed to refer such request or proposal to the APO within the Office of Legal Affairs for a determination of whether a new designation must be made, or whether a

case-by-case determination is required in relation to the type of request or proposal. DSS Program areas and shared services divisions are informed when new designations affecting or related to their operations are made.

In a case where a collection or disclosure does not fall within one of the categories designated as routine by the APO, but where urgency or considerations of safety make adherence to ordinarily required procedures impracticable, such collection or disclosure may be classified as one required by exigent circumstances. In these instances, DSS staff are directed to consult the APO and/or a supervisor. DSS staff must retain information about the particular collection, request, or disclosure, as well as an explanation of why exigent circumstances existed requiring the collection or disclosure. DSS staff must immediately provide a written report to the APO, who will notify the Chief Privacy Officer, where appropriate. DSS Staff have been informed of criteria that may constitute the existence of exigent circumstances, including imminent danger or threat to individual health or safety.

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 have been approved by the agency privacy officer to disclose identifying information. Be as specific as possible.**

Because DSS/HRA/DHS oversees and administers a great number of programs, benefits, and services, the divisions and categories of employees who are approved to disclose identifying information range from program to program. Nevertheless, such authority to make disclosures of identifying information is always limited to divisions that routinely access identifying information to fulfill the essential roles of that division, and is further limited to employees within those divisions who are designated to handle disclosures as part of their job responsibilities.

The category—or categories—of employees who are authorized to make identifying information disclosures will depend on the particular division and that unit's operational and administrative responsibilities and activities. In some instances, the ability to make disclosures is limited to Directors, Managers, and legal staff. In units that are more client-facing, categories of employees authorized to disclose may include Eligibility Specialists and Case Managers—but only after certain requirements are met (e.g., identity verification procedures, confirmation of valid client authorization and consent).

Employees who do not routinely access client or staff information or are not designated to handle disclosures of identifying information as part of their job function are prohibited from disclosing such information. If such an employee receives a request for identifying information, that employee must route the request to the appropriate unit or office, as outlined within Agency policy. Depending upon the nature of the request, employees are required to direct inquiries to the Office of the General Counsel, Office of Legal Affairs, or Office of Communications and Marketing, as appropriate.

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 since 2020 that minimize the collection, retention, and disclosure of identifying information to the greatest extent possible while furthering the agency's purpose or mission.**

Because existing policies and procedures already address—and require—that DSS/HRA/DHS minimize the collection, retention, and disclosure of identifying information, DSS/HRA/DHS has not implemented any alternative policies since 2020. Such policies and procedures are also applicable to DSS/HRA/DHS contractors and subcontractors.

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.**

Whether an agreement is required for a particular data share or relationship is evaluated by the Commercial Law Division and the Office of Data Privacy within the DSS Office of Legal Affairs. Overall, the Agency's approach to the use of agreements for any use or disclosure of identifying information reflects the prior and updated guidance provided in the Citywide Privacy Protection Policies and Protocols, which was most recently updated

in February 2021. Additional considerations include prior relationships and/or existing agreements between the relevant parties, the types of identifying information involved, the frequency of the data exchange, the data security controls in place and applicable requirements under federal, state, and local law, among others. In addition to those considerations, the Office of Data Privacy also uses the Citywide Privacy Protection Policies and Protocols as guidance.

In general, before the Agency discloses identifying information outside of the Agency (e.g., contractor, another City agency, or external entity), DSS executes some kind of contract, Memorandum of Understanding, Nondisclosure Agreement, or other appropriate data share agreement that memorializes the terms and purpose of the relationship and disclosure. Such agreements are drafted by Commercial Law and reviewed for privacy issues by the Office of Data Privacy. These agreements typically include, at the very least: the term period of the data sharing/use, the specific data elements that will be exchanged or shared, the purpose for collection and/or disclosure, and additional terms regarding handling of confidential and/or identifying information, as well as information about whether the data will be shared pursuant to consent, or an applicable legal exception. And as appropriate, these agreements also include the appropriate Rider.

Standard requirements related to protecting the privacy and security of identifying information are included in such agreements as per a template approved by the NYC Law Department, and are drafted and/or reviewed by the Commercial Law Division and NYC Law Department, as appropriate, in conjunction with the Office of Data Privacy. Requirements include provisions addressing: (1) ownership of identifying information; (2) limitations on access to identifying information; (3) limitations on retention of identifying information; (4) handling of third-party requests for information; (5) effects of unauthorized disclosures; (6) use of administrative, technical, and physical safeguards; and (7) additional general confidentiality provisions.

In addition to human services contracts, the February guidance issued by CPO added two additional categories of contacts now subject to the Identifying Information Law: technology services and certain contracts and subcontracts involving outreach services for non-Agency clients. The Agency now attaches the appropriate Rider to these agreements as well.

**N.Y.C. Admin. Code §23-1205(a)(1)(d)**

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

**Add additional rows as needed.**

Type of Entity	Description of Reason for Disclosure	Description of how disclosure furthers the agency's purpose or mission
<b>Federal, state, and local oversight agencies and entities</b>	DSS discloses identifying information to these agencies and entities in order to comply with the various regulations, rules, and guidelines imposed on DSS/HRA/DHS as a condition of funding. Additionally, DSS/HRA/DHS discloses information for purposes of meeting reporting requirements regarding: government grants, benefit eligibility verification, program administration, and for general oversight purposes and as required by law.	By disclosing identifying information to oversight agencies and entities, DSS/HRA/DHS ensures that it is complying with federal and state rules re: program and benefit administration requirements and fulfills reporting and funding obligations.
<b>Clients and authorized representatives</b>	DSS discloses information to clients and/or their authorized representatives when such individuals request case records or other information about their case, or wish to discuss case details.	In general, clients and authorized representatives are entitled to their own case information and records under applicable federal and state law and regulation. Disclosures to clients and authorized representatives is also necessary for the proper administration of DSS/HRA/DHS programs.
<b>Research firms, university-based researchers / fellows &amp; related entities</b>	DSS discloses data, including personal identifying information, to researchers in response to requests submitted in accordance with DSS/HRA/DHS procedures where such disclosures are permitted by applicable law pursuant to client authorization. If such disclosure results in a publication, that publication will only include aggregated and / or de-identified information, unless client authorization was obtained that permits otherwise.	Such research-related disclosures allow DSS/HRA/DHS to participate in a wide-range of research endeavors on important issues that impact DSS/HRA/DHS's administration of social services and public benefits programs. The resulting research and findings help inform and enhance evidence-based decision-making and contribute to DSS/HRA/DHS's ability to develop policy and programmatic recommendations and improvements.
<b>Federal, state, local, or other authorized auditing bodies</b>	DSS discloses identifying information to auditors for purposes of conducting quality control, compliance, and program review assessments.	Disclosures to entities authorized to conduct audits ensure that DSS/HRA/DHS remains in compliance with legal, administrative, program maintenance, and reporting requirements promulgated under federal, state, or local law and regulation.
<b>Law enforcement officers &amp; District Attorney's / U.S. Attorney's Offices</b>	DSS makes such disclosures pursuant to lawful administrative requests, subpoenas, or similar demands, but only where the request is accompanied by a valid written authorization or court order. Absent client authorization, DSS may make disclosures in certain circumstances if an appropriate legal basis exists in applicable law for the particular circumstance.	Disclosures to law enforcement officers and district attorney's offices are often necessary for the adjudication of civil, criminal, or administrative proceedings and may be required to comply with applicable law. Such disclosures may also be required to protect DSS/HRA/DHS and / or client interests in such proceedings.
<b>Contracted service providers, vendors &amp; consultants</b>	DSS/HRA/DHS discloses identifying information to contractors, vendors, and consultants who have entered into agreements with the agency so that such entities or persons may carry out their roles and responsibilities under such	Disclosures to contracted service providers and vendors are necessary to effectively serve DSS clients and enable and facilitate DSS/HRA/DHS's ability—and the ability of its contracted providers,

	agreements. Contractors and vendors include but are not limited to contracted client service and shelter providers, entities performing support functions for DSS/HRA/DHS programs, community-based organizations, and facilitated enrollers.	vendors, and consultants—to carry out functions necessary for the proper administration of DSS/HRA/DHS programs.
<b>Community-based organizations (CBOs)</b>	DSS/HRA/DHS often partners with CBOs to better provide services to clients by facilitating outreach, services, and client-CBO relationships. Such partnerships require that DSS/HRA/DHS disclose to CBOs certain demographic, contact, and other identifying information.	Disclosures to COBs help DSS/HRA/DHS expand and enhance outreach, case management, and other services and benefits for clients.
<b>Third parties designated by clients or authorized representatives</b>	DSS discloses identifying information to third parties designated by clients or their authorized representatives pursuant to valid written authorization for various purposes, including litigation or individual case management purposes.	Disclosures to third parties designated by clients or authorized representatives are necessary for proper administration of DSS/HRA/DHS programs. In general, clients have the authority to direct the disclosure of their case records or information to individuals they have designated in writing.
<b>Courts &amp; opposing counsel</b>	DSS discloses identifying information to courts and opposing counsel, subject to applicable law, in the course of ongoing litigation for purposes of discovery, case preparation, and related work required to participate in litigation and administrative proceedings.	Disclosures to courts or opposing counsel is necessary for the adjudication of civil, criminal, or administrative proceedings, and are often required by law, and / or required in order to protect DSS/HRA/DHS interests and / or client interests.
<b>Medical providers &amp; Managed Care Plans</b>	DSS discloses identifying Medicaid information to medical providers, including hospitals, doctors, pharmacies, and nursing homes, as well as to Managed Care Plans, in order to resolve coverage and/or access to care issues for clients. Identifying information is also disclosed to treating clinicians and facilities in order to engage and monitor treatment progress of clients in medical, mental health, and substance use treatment.	Disclosures to medical providers and Managed Care Plans allow proper program maintenance and monitoring across various program areas, including Medicaid and vocational and substance use rehabilitation, and help ensure that clients have ongoing and effective access to appropriate care.
<b>Fair Hearing advocates</b>	DSS discloses identifying information to advocates representing clients in Fair Hearings via certain processes and litigation stipulations. Registered advocates, authorized by DSS, have access to receive fair hearing evidence packets via electronic systems.	Disclosures made in the course of Fair Hearings assist DSS/HRA/DHS in properly preparing for and participating in hearings required under state regulations.
<b>Personnel union representatives</b>	DSS discloses identifying information of personnel, subject to applicable law, to union representatives for employment-related issues, including information required for collective bargaining representation issues.	Disclosures to union representatives ensure appropriate treatment and resolution of DSS/HRA/DHS employee-related issues.
<b>Other City agencies (e.g., Department of Investigation, Administration for Children’s Services, Department of Records and Information Services,</b>	DSS discloses identifying information to other City agencies for a wide range of purposes that enhance DSS/HRA/DHS’s ability to enhance the administration of programs, benefits, and services to eligible clients. These disclosures are done pursuant to data sharing agreements that memorialize the data	Such disclosures aid in the administration of programs and service delivery, allow for increased service coordination across agencies, achieve other administrative goals—such as efficient records management—and aid in resolution of claims against the City and other related litigation.

Comptroller's Office, Law Department, etc.)	being disclosed, the specific purpose of the disclosures, and any other terms (including whether disclosures are made pursuant to consent or based on a legal exception) necessary for the particular initiative.	
<b>Other state and federal agencies</b> (e.g., Division of Criminal Justice Services, U.S. Department of Veteran Affairs, etc.)	DSS/HRA/DHS discloses identifying information to state and federal agencies for a wide range of purposes related to enhancing the efficient administration of services, benefits, and programs to eligible clients. These disclosures are done pursuant to data sharing agreements that memorialize the data being disclosed, the specific purpose of the disclosures, and any other terms (including whether disclosures are made pursuant to consent or based on a legal exception) necessary for the particular initiative.	Such disclosures aid in the administration of programs and service delivery and allow for increased service coordination across shared client populations.
<b>Estate administrators &amp; beneficiaries</b>	DSS discloses identifying information to estate administrators and beneficiaries for purposes of notifications of benefit reimbursement claims against inheritances or estates.	Disclosures to estate administrators and beneficiaries allow DSS/HRA/DHS to ensure appropriate benefit distribution and reimbursement.
<b>Landlords &amp; brokers</b>	DSS may disclose identifying information to landlords and brokers in the course of administering certain benefits, such as rental assistance, and investigating potential instances of source of income discrimination.	Disclosures to landlords and brokers ensure proper administration of housing, subsidy, and rental assistance programs.
<b>Press outlets &amp; media</b>	DSS produces stories for dissemination on press outlets and prepares responses to press inquiries. Disclosures of client identifying information to press outlets and media are made, if applicable, only pursuant to client authorization.	Disclosures to the press and media outlets are necessary for external messaging and publication of DSS/HRA/DHS's mission, goals, and activities.
<b>Elected officials, constituents &amp; other advocates / constituents</b>	DSS discloses identifying information to elected officials and other advocates / constituents—which are only made pursuant to client authorization—for purposes of resolving DSS program inquiries and concerns.	Disclosures to elected officials and other advocates / constituents ensure that DSS provides efficient and meaningful responses and solutions to concerns and questions DSS receives. Such disclosures also help reduce the barriers that high-need individuals may face in accessing services and benefits.
<b>Insurance companies</b>	DSS discloses identifying information to insurance companies in the course of performing human resources and other personnel related matters, including benefits administration.	Disclosures to insurance companies are necessary for proper administration of DSS/HRA/DHS employee benefits, including medical insurance.
N.Y.C. Admin. Code §23-1205(a)(1)(e)		

- Proceed to Next Question on Following Page-

**15. Describe the impact of the Identifying Information Law and other local, state, or federal laws upon your agency's practices in relation to collecting, retaining, and disclosing identifying information (i.e., if such practices would differ in the absence of these laws).**

DSS/HRA/DHS is required to comply with various state and federal laws regarding the handling of identifying information, including but not limited to: Titles 7 and 26 of the United States Code; Titles 42 and 45 of the Code of Federal Regulations; the New York State Social Services Law and implementing Title 18 New York Codes, Rules, and Regulations; the New York State Public Health Law; the Health Insurance Portability and Accountability Act (HIPAA); NY Public Officers Law; the NY Mental Hygiene Law; the NY Civil Practice Law & Rules; and the NYC Administrative Code, including the Identifying Information Law. Thus, DSS/HRA/DHS practices regarding the collection, retention, and disclosure of identifying information are governed by extensive restrictions under federal and state laws and regulations, as well as the Identifying Information Law.

In general, the impact of federal, state, and local laws is that the identifying information collected, retained, and disclosed by DSS/HRA/DHS is deemed confidential and / or protected under applicable federal, state, and local laws and regulations, the source of which varies depending on the source and category of information. Before DSS/HRA/DHS collects, retains, or discloses identifying information, DSS/HRA/DHS must comply with various legal requirements, including but not limited to obtaining client authorization / consent, using administrative, physical, and technical safeguards to protect information within DSS/HRA/DHS possession and control, and making legal determinations regarding acceptable program practices regarding the handling of identifying information. These practices may vary depending on the category and source of the information.

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 collecting, retaining, and disclosing identifying information (i.e., if they have affected such practices).**

DSS/HRA/DHS already operates within a robust confidentiality and privacy framework due to the restrictions and regulations imposed by federal and state laws and regulations regarding the handling of identifying information. Prior to the enactment of the Identifying Information Law, federal and state laws and regulations had already formed the foundation of DSS/HRA/DHS policies and procedures regarding the handling of identifying information.

The Chief Privacy Officer's privacy policies and protocols and the Citywide Privacy Protection Committee's work support and reinforce the restrictions imposed on DSS/HRA/DHS by federal and state law and regulation, and adds another level of reporting and compliance work to DSS operations.

N.Y.C. Admin. Code §23-1205(a)(3)

**APPROVAL SIGNATURE FOR AGENCY REPORT**

**Preparer of Agency Report:**

<b>Name:</b>	Lauren Friedland		
<b>Title:</b>	DSS Chief Data Privacy Officer / Associate General Counsel		
<b>Email:</b>	<a href="mailto:friedlandl@dss.nyc.gov">friedlandl@dss.nyc.gov</a>	<b>Phone:</b>	929-221-6535

**ELECTRONIC SIGNATURE OF AGENCY HEAD OR DESIGNEE REQUIRED BELOW**

**Agency Head (or designee):**

<b>Name:</b>	Lauren Friedland		
<b>Title:</b>	DSS Chief Data Privacy Officer / Associate General Counsel		
<b>Email:</b>	<a href="mailto:friedlandl@dss.nyc.gov">friedlandl@dss.nyc.gov</a>	<b>Phone:</b>	929-221-6535



<b>Electronic Signature:</b>	<i>Lauren Friedland</i>	<b>Date:</b>	July 29, 2022
----------------------------------	-------------------------	--------------	---------------

— *End of Document* —

---