



August 21, 2018

Mayor Bill de Blasio  
Office of the Mayor, City of New York  
City Hall, 1st Floor  
New York, NY 10007

Re: Local Laws 245 and 247 of 2017 Identifying Information Law

Dear Mr. Mayor:

Please find our Agency's first report on the collection, retention, and disclosure of identifying information, as mandated by Local Laws 245 and 247 of 2017.

As a general matter, the Department of Transportation (DOT) collects and retains identifying information that is required to facilitate the administrative, contracting, legal, permitting, inspecting and other similar functions and responsibilities that are necessary to the agency's business and mission. Information is shared with other city, state and federal agencies as required for the processing of various approvals, filings, oversight and reporting. The responses contained in the attached form reflect the cumulative responses agency-wide.

It is important to note that the attached form does not distinguish between mandatory, incidental or minimal collection, retention or disclosure. For example, DOT collects specific additional personal information for HR, EEO and certain types of parking permits. Also, while the form does not distinguish between collection, retention or disclosure types, generally, requests to share personally identifiable information are reviewed by DOT's Division of Legal Affairs and appropriate determinations are made.

Sincerely,  
  
Polly Trottenberg  
Commissioner

## AGENCY REPORT

(due on or before July 31, 2018, and by July 31 every two years thereafter)

<b>Agency:</b>	DEPARTMENT OF TRANSPORTATION (DOT)		
<b>Agency Privacy Officer:</b>	TAMARA MURRAY		
<b>Email:</b>	<a href="mailto:tmurray2@dot.nyc.gov">tmurray2@dot.nyc.gov</a>	<b>Telephone:</b>	(212) 839-9834
<b>Date of Report:</b>	August 21, 2018		

1. Specify the types of identifying information collected, retained, and disclosed by the agency	
<i>Check all that apply.</i>	
<input checked="" type="checkbox"/> Name	<input checked="" type="checkbox"/> Date of Birth
<input checked="" type="checkbox"/> Current and/or previous home addresses	<input checked="" type="checkbox"/> Place of Birth
<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Marital or partnership status
<input checked="" type="checkbox"/> Contact information (e.g., phone or email)	<input checked="" type="checkbox"/> Citizenship/immigration status
<input checked="" type="checkbox"/> Religion	<input checked="" type="checkbox"/> Nationality
<input checked="" type="checkbox"/> Employment status	<input checked="" type="checkbox"/> Country of origin
<input checked="" type="checkbox"/> Employer information	<input checked="" type="checkbox"/> Languages spoken
<input checked="" type="checkbox"/> Employment address	<input checked="" type="checkbox"/> Social media account information
<input checked="" type="checkbox"/> Motor vehicle information	<input checked="" type="checkbox"/> Income tax information
<input checked="" type="checkbox"/> Biometric information	<input checked="" type="checkbox"/> Any scheduled court appearances
<input type="checkbox"/> Eligibility for/receipt of public assistance or city services	<input checked="" type="checkbox"/> Arrest record or criminal conviction
<input checked="" type="checkbox"/> Status as victim of domestic violence or sexual assault	<input checked="" type="checkbox"/> Status as crime victim or witness
<input checked="" type="checkbox"/> Date and/or time of release from custody of ACS, DOC, or NYPD	<input checked="" type="checkbox"/> Any scheduled appointments with any employee, contractor, or subcontractor
<input type="checkbox"/> Information obtained from any surveillance system operated by, for the benefit of, or at the direction of the NYPD	<input checked="" type="checkbox"/> Social Security Number
<input checked="" type="checkbox"/> Other - Video and photographic images of violations recorded under the Vehicle and Traffic Law Security camera footage from Agency facilities and property	
<small>N.Y.C. Admin. Code §23-1205(1)(a)</small>	

2. Specify the reasons why collection and retention of identifying information specified above furthers the purposes or mission of your agency.
<p>The Department of Transportation performs its mission as set forth in NY City Charter Sections 14 and 71 and New York Administrative Code Title 19. The Agency collects identifying information necessary to perform core administrative functions such as Human Resources staff hiring, contract procurement and management and administering programs such as the Parking Permits unit. Information is shared with other city, state and federal agencies as outlined in the answers to #14 of this form.</p> <p>None of the information collected and retained is available for general disclosure. Staff route requests for disclosure to Legal Affairs and seek guidance from our attorneys on whether and under what circumstances disclosure may be permitted.</p> <p>The collection, retention and disclosure of identifying information furthers the Agency's mission in the normal course of business. The Agency performs work to achieve the goals of equitable service delivery by:</p> <ul style="list-style-type: none"> <li>• Providing safe, efficient, and environmentally responsible movement of pedestrians, goods, and vehicular traffic on the streets, highways, bridges, and waterways of the City's transportation network;</li> <li>• Improving traffic mobility and reducing congestion throughout the City;</li> </ul>

**Identifying Information Law**

- Rehabilitating and maintaining the City's infrastructure, including bridges, tunnels, streets, sidewalks, and highways;
- Encouraging the use of mass transit and sustainable modes of transportation; and
- Conducting traffic safety educational programs

The units specified in response to question #3 below, have been identified as of the filing of this report. The Agency APO will continue to assess the Agency's procedures and assign /update designations on an ongoing basis.

N.Y.C. Admin. Code §23-1205(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.**

Add additional rows as needed.

Describe the Collection or Disclosure	Classification Type
<p><b>Agency Chief Contracting Officer (ACCO)</b> The ACCO collects retains and discloses information related to the oversight of all Agency procurement efforts, managing procurements that require contracts and for the solicitation and selection of vendors, change orders, time extensions, dispute determinations, and contractual compliance with labor law, local, federal and state procurement requirements.</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><b>Advocate</b> The Advocate's Office collects, retains and discloses various personnel related information and records in the performance of core duties of the unit, to investigate and prosecute complaints of employee misconduct.</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><b>Bikes in Buildings</b> The Bikes in Buildings program collects, retains and discloses limited information received from program applicants in the performance of the core function of the program, to implement the Bicycle Access to Office Buildings Law. The program allows tenants of office buildings to request bicycle access for their employees.</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>Bridges – Truck Permits</b> The Truck Permit Unit collects and retains the information submitted by permittees in the performance of its core function of issuing Annual Overweight Truck Permits, Daily Over-dimensional Truck Permits, and Special Hauling Crane Permits for transit of said vehicles within the five boroughs of New York City.</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>Camera (Automated Enforcement) Unit</b> The Automated Enforcement Unit in conjunction with their contractor, collects, retains and discloses information necessary to issue notices of liability to motorists who proceed into the crosswalk while the signal is red, operate their vehicles in lanes designated "bus lane only" or speed within designated zones.</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><b>Commissioner's Correspondence Unit</b> The Commissioner's Correspondence Unit collects, retains and discloses information necessary to manage all aspects of customer communications and feedback to address concerns, queries, requests, complaints and suggestions from the public.</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>Concessions &amp; Franchises</b> The Franchises and Concessions Unit collects, retains and discloses, information received from the public in their applications for concessions and/or franchises in the performance of core functions of the unit of allowing the public to do business with the city and providing more safe and efficient spaces in the city for citizens to use.</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>Equal Employment Opportunity, Diversity and Inclusion (EDI)</b> The EDI Office collects and retains various personnel related information and records in the performance of core equal employment and diversity functions including conducting</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies

investigations.	<input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Ferries</b> The Ferries Division collects, retains and discloses identifying information necessary to operate the Staten Island Ferry and oversee private Ferries.	<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>Fleet</b> The Fleet Services Division collects and retains employee related information in the performance of core administrative and fleet functions of assuring the safe working condition of the Agency's motor vehicles and equipment, vehicle specification preparation, preparing new vehicles for introduction into the fleet, managing the "Car Share" program, administrating fuel cards, coordinating traffic and parking violations, overseeing rental activity, and developing and implementing strategies for equipment maintenance and responsible repair practices.	<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>Highway Inspection Quality Assurance (HIQA)</b> The HIQA Unit collects, retains and discloses information necessary to inspect and issue summonses for defacement cases, where individual property owners are named as respondents.	<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>Human Resources (Department of Occupational Safety and Health)</b> The DOSH Unit collects, retains and discloses information necessary in performing core duties of ensuring that the workplace conforms to applicable standards and that employees use safe tools, equipment, and protective gear and in managing the Agency's compliance with federal state and local occupation safety and health laws.	<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>Human Resources (Drug &amp; Alcohol Testing Unit)</b> The Drug and Alcohol Testing Unit collects, retains and discloses information required for compliance with various federal employee drug and alcohol testing regulations and the enforcement of contractual testing for some civil service titles.	<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>Human Resources (Facilities and Security Management)</b> The Facilities and Security Management Unit collects, retains and discloses information necessary to support the Agency's real estate portfolio including environmental and other code compliance in addition to monitoring security such as theft vandalism or other crimes on Agency property.	<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>Human Resources (Labor Relations)</b> The Office of Labor Relations collects retains and discloses information required to perform its core functions of enforcing labor agreements, guaranteeing rights of employees to union activities and interfacing between management and the Mayor's Office of Labor Relations.	<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
<b>Human Resources (Payroll and Personnel)</b> The Payroll and Personnel Units collect, retain and disclose, various payroll and personnel-related information and records in the performance of core administrative and human resource functions.	<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
<b>IT and Telcom</b> The IT&T Division collects, retains and discloses information in the performance of IT related functions including but not limited to hosting, database administration and management, helpdesk, asset management and cyber security.	<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>Language Access</b> The Language Access Unit collects and retains limited NYC customer information during the performance of the core function of providing language accessibility to members of the public who speak various languages so that they may be better able to understand the	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies

information DOT provides, and take advantage of opportunities and innovations DOT provides.	<input type="checkbox"/> Approved by APO on a case-by-case basis
<b>Legal Affairs</b> The Legal Affairs Division collects, retains and discloses identifying information necessary in performing its core mission as Counsel for the Agency, performing transactional, contract, and regulatory compliance, litigation, litigation support, FOIL, records management and other legal functions.	<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
<b>Parking Administration Modelling &amp; Data Analysis</b> The Parking Administration Unit collects and retains data received from the TLC in order to perform its core function of identifying and implementing state-of-the-art analytical techniques focusing on the assessment of roadway network operations. These techniques are used to further regional planning, short and long term planning strategies, maintenance and protection of traffic plans, geometric and operational roadway alterations.	<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
<b>Permit Management Office</b> The Permit Management Office collects and retains identifying information provided by permittees in furtherance of its core mission of reviewing and approving applications for construction on city roadways and sidewalks.	<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>Parking Permit Unit</b> The Parking Permit Unit collects, retains and discloses information needed to provide applicants with parking permits in furtherance of its core mission of providing parking permits for persons with disabilities, special uses and for city and various other vehicles.	<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
<b>Public Spaces</b> The Public Spaces Unit collects and retains identifying information in order to perform its core mission of transforming underused streets into vibrant, social public spaces during certain months of every year by way of its Street Furniture Program which allows citizens to partner with DOT.	<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>Recoupment</b> The Recoupment Unit collects, retains and discloses information necessary to recover expenses paid for damage to Agency property by members of the public.	<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>Research and Implementation and Safety (RIS)</b> The RIS Unit collects, retains and discloses records that contain identifying information for research needed to inform policies and procedures regarding safety.	<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
<b>Revocable Consents</b> The Revocable Consents Unit collects, retains and discloses various information received by the public in their applications for revocable consents in the performance of core functions of the unit to grant the right to construct and maintain certain structures over and under city streets and sidewalks.	<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>Sidewalks Unit</b> The Sidewalks Unit collects, retains and discloses information on property owners in the performance of the unit's core mission of making sidewalks safe and accessible, by among other function, inspecting sidewalks and issuing violations to property owners.	<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>Strategic Communications Unit (including Social Media)</b> The Strategic Communication Unit collects, retains and shares identifying information submitted by the public as a core function of its mission of informing the public via social media and other avenues of communication, of initiatives and programs that affect residents and visitors.	<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>Agencywide</b> All DOT Divisions collect, retain and share identifying information routed from submissions by the public to DoITT's 311 or via other communication to the Agency that may contain identifying information. This process is part of the Agency's core mission of promptly responding to safety concerns as well as investigating, inspecting and repairing defective conditions.	<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
N.Y.C. Admin. Code §23-1205(1)(b)	

**4. If applicable, specify the types of collections and disclosures approved by the Chief Privacy Officer.**

Add additional rows as needed.

Describe Type of Collection or Disclosure
N/A
N.Y.C. Admin. Code §23-1205(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.**

The current policies are of cooperation and collaboration with other Mayoral Agencies. Pre-approved access to data and databases is given by IT and Telecom and the unit heads to other Agency users as required, in order to execute routine functions in furtherance of our Agency's and the City's mission. Users of Agency databases are afforded the most restricted access necessary for them to perform required tasks.

Requests for Agency records (including records containing identifying information) are routed to our FOIL unit where our FOIL Records Access Officer conducts a review and a determination is made on a case by case basis on what records or portions of records may be disclosed.

Post the adoption of the Identifying Information Law (the law), the Agency is reviewing its procedures and protocols providing pre-approval where warranted, for routine matter disclosures and advising staff to contact the APO if there are any matters that need to be assessed. Additionally DOT's APO has received communication from other agency APOs regarding information routinely shared between agencies.

The law has certain congruencies with previously existing laws and policies regarding confidentiality of certain records. The categories of data that are included in the law is broader than the previously defined categories of data and records that were subject to a heightened level of protection. Currently, we utilize existing contract boilerplate language that require compliance with applicable laws and "Appendix A" regarding confidentiality of records. Additionally, our Agency has issued a memorandum dated December 18, 2017, titled "Reminder to Secure Records Containing Personally Identifiable Information (PII)". DOT has also utilized Memoranda of Understanding (MOUs) with confidentiality clauses to protect data that may include categories now delineated by the law as identifying information.

<b>6. Do the above policies address access to or use of identifying information by employees, contractors, and subcontractors?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>7. If YES, do such policies specify that access to such information must be necessary for the</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<b>performance of their duties?</b>	
<b>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.</b>	<p>DOT staff contacts Agency attorneys in the appropriate Legal Affairs Units for advice when presented with requests for records outside the scope of the unit's regular work flow. Attorneys for contractors also contact our attorneys if they require a release from a contract confidentiality clause. Staff receive COIB training regarding the prohibition against the unauthorized use of information collected by the city.</p>
N.Y.C. Admin. Code §§23-1205(1)(c)(1), and (4)	
<b>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.</b>	
<p>DOT has utilized MOUs with some other agencies regarding what can be disclosed, who has access and how information can be used. Requests are routed through the FOIL Unit where a case by case review of requests is performed and a determinations made on disclosure to conform to applicable laws.</p>	
N.Y.C. Admin. Code §23-1205(1)(c)(2)	
<b>10. Describe the agency's current policies regarding the classification of disclosures as necessitated by the existence of exigent circumstances or as routine.</b>	
<p>Existing Agency disclosures have been classified as "routine" following a review of the current procedures using the guidance received by the agencies from the Chief Privacy Officer. Disclosures under exigent circumstances are currently made after legal review and will be routed to the APO as soon as possible of such disclosures.</p>	
N.Y.C. Admin. Code §23-1205(1)(c)(3)	
<b>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.</b>	
<p>Staff assigned to specific units that need to routinely disclose identifying information in performing the functions of their mission, disclose unit specific or topic specific identifying information that they are trained and authorized to disclose.</p>	
N.Y.C. Admin. Code §23-1205(1)(c)(4)	
<b>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.</b>	
<p>Please see memo to Executive staff from our COO, General Counsel and Deputy Counsel dated December 18, 2017 "Reminder to Secure Records Containing Personally Identifiable Information (PII)" The Agency is reviewing current policies and will be guided by the APO.</p>	
N.Y.C. Admin. Code §23-1205(4)	

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

The Agency has utilized MOUs and contract clauses to identify items that may include identifying information and stipulate the specific purposes for which the information is collected, retained and shared and the parameters for disclosure. The Agency also utilizes the provisions of contract boilerplate Appendix A.

N.Y.C. Admin. Code §23-1205(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
Corporation Counsel of the City of NY Private attorneys representing DOT	Disclosure in Litigation where Corporation Counsel or a private attorney is representing the interests of the City.	Information necessary for our attorneys at the Corporation Counsel of the City of New York to represent us is shared. Information is disclosed so that Corporation Counsel can give legal advice to the Agency.
Various City, State and Federal Agencies	Disclosure for Local State or Federal Oversight	Information necessary to comply with legal mandates for disclosure.
Various contractors and consultants	Disclosures to contractors and consultants necessary to perform functions on behalf of the Agency.	The Agency contracts with various entities in a variety of fields such as construction and rehabilitation projects, drug and alcohol testing, fitness for duty examination and other medical examinations.
Various contractors and consultants, City, State and Local and Federal oversight agencies	Health and safety Prevention Disclosure	Identifying information contained in records such as are required for functions related to drug and alcohol testing, employees safety training and employees' on the job injuries is shared as required.
Members of the public, Elected officials and Community Boards	Disclosure for customer service purposes	Response to concerns of the public regarding safety and other core functions, dissemination of information
Office of the Comptroller and other oversight entities	Disclosure to auditors	Accountability, identifying and preventing fraud and waste detecting and recovering improper payments, legal requirement, oversight.
The public	Disclosure in response to FOIL	All Agencies are legally required to provide the public with access to its records pursuant to FOIL, subject to the exceptions noted in the Law.
Labor unions, OLR, Administrative hearing bodies	Disclosure to labor organizations	This is a legal/contract requirement, necessary for our Agency and its employees.
Office of the Comptroller, MOCS	Disclosure related to procurement	The procurement process is necessary in furthering the Agency's mission.

N.Y.C. Admin. Code §23-1205(l)(e)

- Proceed to Next Question on Following Page -

**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.**

**Identifying Information Law** - Greater awareness and the beginning of a critical overview of policies and procedures is in progress. In order to prepare the Agency's report a review of current procedures was conducted. Instances of the collection, retention and disclosure of identifying information by various units were identified and work flows reviewed. The APO has been in contact with other APOs regarding information that is shared. The Agency's executive staff have been briefed on the law and its impact.

**Re other Laws** - Procedures for collection retention and disclosure of information is more restricted.

N.Y.C. Admin. Code §23-1205(2)

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

The Chief Privacy Officer has not implemented any protocols as of the filing date. DOT will work with the Chief Privacy Officer as new directives are disseminated.

N.Y.C. Admin. Code §23-1205(3)


**APPROVAL SIGNATURE FOR AGENCY REPORT**

**Preparer of Agency Report:**

<b>Name:</b>	Tamara Murray		
<b>Title:</b>	Deputy Counsel		
<b>Email:</b>	Tmurray2@dot.nyc.gov	<b>Phone:</b>	212-839-9834

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

**Agency Head (or designee):**

<b>Name:</b>	Polly Trottenberg		
<b>Title:</b>	Commissioner		
<b>Email:</b>	ptrottenberg@dot.nyc.gov	<b>Phone:</b>	212-839-6400
<b>Signature:</b>		<b>Date:</b>	8/21/18

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