

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

<b>Agency:</b>	Department of Youth and Community Development.		
<b>Agency Privacy Officer:</b>	Caroline Press		
<b>Email:</b>	cpress@dycd.nyc.gov	<b>Telephone:</b>	646 343 6270
<b>Date of Report:</b>	July 31, 2018		

**1. Specify the types of identifying information collected, retained, and disclosed by the agency**

*Check all that apply.*

<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 checked="" 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 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: Veterans information, substance abuse information, physical and mental health information, educational level	

N.Y.C. Admin. Code §23-1205(1)(a)

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

As the youth services and community development agency for the City, DYCD's mission is to alleviate the effects of poverty and to provide opportunities for New Yorkers and communities to flourish. DYCD accomplishes this objective by funding a wide range of human services, through contracts with non profit organizations. The program areas DYCD funds and oversees include afterschool programs, literacy programs, runaway and homeless youth programs, workforce programs, and community centers. DYCD collects and retains identifying information necessary to the administration/oversight of the programs funded by the agency, as well as the agency's internal operations. The collection and retention of identifying information serves to further DYCD's mission by allowing for evaluation and appropriate oversight; creating opportunities for synergies among program areas and funded contractors; and enabling program participants to avail themselves of other city or DYCD-funded opportunities.

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
Information collected from and concerning DYCD funded program participants as part of their registration/participation in the programs.	<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
Information collected and disclosed as part of the administration and oversight of funded programs, by both DYCD and its oversight agencies.	<input 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.**

Requests for disclosures are reviewed by senior management, including Office of Legal Affairs, to make sure that any such disclosure is allowed by law and furthers a legitimate interest that advances the purpose or mission of the agency. DYCD typically requires a written agreement to be in place before any disclosure to other city agencies or third parties take place; such agreements are reviewed by the Office of Legal Affairs.

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

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

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

DYCD endeavors to ensure that access to any identifying, personal or confidential information is limited to those with a legitimate need for such access.

N.Y.C. Admin. Code §§23-1205(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.**

Requests for disclosures are reviewed to make sure that any such disclosure is allowed by law and furthers a legitimate interest that advances the purpose or mission of the agency. DYCD typically requires a written agreement to be in place before any disclosure to other city agencies or third parties take place; such agreements are reviewed by the Office of Legal Affairs.

N.Y.C. Admin. Code §23-1205(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.**

DYCD's current policy is for DYCD staff to contact the Office of Legal Affairs in the event that they receive a request for information that is in any way unusual; an agency attorney will review the request and determine the appropriate response, in accordance with applicable laws and city policies, including the Model Citywide Protocol for Handling Third Party Requests for Information Held by City Agencies.

N.Y.C. Admin. Code §23-1205(1)(c)(3)

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

The agency division or category of employee that makes disclosures of identifying information on behalf of DYCD depends on the nature of the information, where it 'resides' in the agency, and which unit is best suited to handle the actual disclosure. For information that is maintained on a database, DYCD's IT unit may be involved. DYCD strives to involve as few people as possible in any disclosure of identifying information.

N.Y.C. Admin. Code §23-1205(1)(c)(4)

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

See above. As part of an ongoing project to universalize agency procedures and integrate separate databases, DYCD has considered the issue of collection of identifying information. The agency is in the process of finalizing a written procedure to codify existing practices for approval of interagency and third party data sharing agreements and the like.

N.Y.C. Admin. Code §23-1205(4)

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

It is DYCD's policy to require the use of an agreement whenever confidential or identifying information is disclosed to another city agency or a third party. The exact terms of a given agreement will depend on the specific information sharing contemplated and who the information is being shared with, but DYCD typically includes in such agreements provisions intended to protect such information, such as an enumeration of the individuals who can see or work with the information; mandated use of protocols to protect identifying information from inadvertent disclosure; and the like.

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
City agencies	To access funding from another agency	Allows DYCD to maximize the amount of funding available for funded programs.
City agencies	Research and evaluation	Allows more informed decision making in terms of funding, program design and evaluation.
City agencies	To create opportunities for DYCD program participants to avail themselves of other City services and benefits.	Promotes better outcomes for participants in DYCD funded programs.
Research organizations	Research and evaluation	Allows more informed decision making in terms of funding, program design and evaluation

N.Y.C. Admin. Code §23-1205(1)(e)

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**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.**

Because the law is so new, it is hard to say what the impact is. The law has already heightened attention to the need to institute appropriate controls around, and limit, the collection and retention of identifying information.

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.**


N/A

N.Y.C. Admin. Code §23-1205(3)

**APPROVAL SIGNATURE FOR AGENCY REPORT**

<b>Preparer of Agency Report:</b>			
<b>Name:</b>	Caroline Press		
<b>Title:</b>	General Counsel		
<b>Email:</b>	cpress@dycd.nyc.gov	<b>Phone:</b>	646 343 6270

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

<b>Agency Head (or designee):</b>			
<b>Name:</b>	Bill Chong		
<b>Title:</b>	Commissioner		
<b>Email:</b>	bchong@dycd.nyc.gov	<b>Phone:</b>	646 343
<b>Signature:</b>		<b>Date:</b>	July 31, 2018

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