

#### BIENNIAL AGENCY REPORT

#### **INSTRUCTIONS**

The Identifying Information Law requires City agencies to submit comprehensive biennial agency reports related to their collection, retention, and disclosure of identifying information and their privacy protection practices.

To complete the 2024 biennial agency report:

- Review Form 2s (<u>APO Designation of Collection and Disclosures as "Routine"</u>) made since the 2022 compliance cycle;
- Review Form 5s (Agency Privacy Officer Approval of Collections and Disclosures on a "Non-Routine" Basis) made since the 2022 compliance cycle;
- Use Forms 2 & 5 to complete <u>Worksheet 1</u> for all new and existing collections between 2022-2024;
- Use Forms 2 & 5 to complete <u>Worksheet 2</u> for all new and existing **disclosures** between 2022-2024.
- Complete the Biennial Agency Workbook;
- Submit the biennial agency report by **July 31, 2024**.

## Submit the biennial agency report to:

- Mayor at MOReports@cityhall.nyc.gov
- City Council Speaker at <a href="mailto:reports@council.nyc.gov">reports@council.nyc.gov</a>
- Chief Privacy Officer and the Citywide Privacy Protection Committee at <a href="mailto:oip@oti.nyc.gov">oip@oti.nyc.gov</a>
- Department of Records and Information Services (DORIS) online submission portal at https://a860-gpp.nyc.gov

THIS REPORT IS PUBLIC. PREPARERS SHOULD CONSULT AGENCY COUNSEL OR THE CHIEF PRIVACY OFFICER TO ENSURE THE RESPONSES ARE PROVIDED ACCORDING TO APPLICABLE LAW AND CITY POLICY.



# **VERSION CONTROL**

Version	Description of Change	Approver	Date
4.0	New design for ease of use and technological	Michael Fitzpatrick	April 2024
	enhancements, and miscellaneous clarifying	Chief Privacy Officer, City of New	
	revisions.	York	
3.0	Updated completion date; miscellaneous clarifying	Aaron Friedman	April 2022
	revisions.	Principal Senior Counsel	
		Office of Information Privacy	
2.0	Updated completion date; miscellaneous clarifying	Laura Negrón	April 2020
	revisions.	Chief Privacy Officer, City of New	
		York	
1.0	First Version	Laura Negrón	April 2018
		Chief Privacy Officer, City of New	
		York	



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# BIENNIAL AGENCY REPORT (Due on or before July 31, 2024)

1. Agency: Business Integrity Commission

2. APO Contact Details

a. Name: Olga Statz

b. Title: General Counsel

c. Email: ostatz@bic.nyc.gov

d. Telephone: 212-437-0510

### **COLLECTIONS**

3. How many collections does the agency have to describe?

13

4. **COLLECTIONS.** Upload worksheet 1.



- Proceed to the next page -



5. For all **collections**, select the types of identifying information collected (check all that apply). *See*Citywide Privacy Protection Policies and Protocols § 3.1.

■ Name	Work-Related Information			
■ Social security number (full or last 4 digits)*	■ Employer information			
■ Taxpayer ID number (full or last 4 digits)*	☐ Employment address			
Biometric Information	Government Program Information			
■ Fingerprints	☐ Any scheduled appointments with any			
■ Photographs	employee, contractor, or subcontractor			
☐ Palm and handprints*	Any scheduled court appearances			
☐ Retina and iris patterns*	☐ Eligibility for or receipt of public assistance or			
☐ Facial geometry*	City services			
☐ Gait or movement patterns*	■ Income tax information			
☐ Voiceprints*	■ Motor vehicle information			
☐ DNA sequences*				
☐ Height				
□ Weight				
Contact Information	Law Enforcement Information			
■ Current and/or previous home address	Arrest record or criminal conviction			
Email address	■ Date and/or time of release from custody of			
■ Phone number	ACS, DOCS, or NYPD			
	Information obtained from any surveillance			
	system operated by, for the benefit of, or at the			
	direction of the NYPD			
<u>Demographic Information</u>	Technology-Related Information			
Country of origin	■ Device identifier including media access			
■ Date of birth*	control (MAC) address or Internet mobile			
Gender identity	equipment identity (IMEI)*			
Languages spoken	GPS-based location obtained or derived from a			
■ Marital or partnership status	device that can be used to track or locate an			
☐ Nationality	individual*			
■ Race	Internet protocol (IP) address*			
☐ Religion	Social media account information			
☐ Sexual orientation				
Status information				
■ Citizenship or immigration status				
■ Employment status				
☐ Status as a victim of domestic violence or				
sexual assault				
Status as crime victim or witness				
Other Types of Identifying Information (list below)	):			
*Type of identifying information designated by the CPO (see CPO Policies & Protocols, §3.1.1).				



## **DISCLOSURES**

6. How many disclosures does the agency have to describe?

13

7. **DISCLOSURES**. Upload worksheet 2.



- Proceed to the next page -



8. For all **disclosures**, select the types of identifying information disclosed (check all that apply). See Citywide Privacy Protection Policies and Protocols § 3.1.

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■ Name	Work-Related Information			
■ Social security number (full or last 4 digits)*	■ Employer information			
■ Taxpayer ID number (full or last 4 digits)*	■ Employment address			
Biometric Information	Government Program Information			
■ Fingerprints	☐ Any scheduled appointments with any			
Photographs	employee, contractor, or subcontractor			
☐ Palm and handprints*	Any scheduled court appearances			
☐ Retina and iris patterns*	☐ Eligibility for or receipt of public assistance or			
☐ Facial geometry*	City services			
☐ Gait or movement patterns*	■ Income tax information			
☐ Voiceprints*	■ Motor vehicle information			
☐ DNA sequences*				
☐ Height				
□ Weight				
Contact Information	Law Enforcement Information			
■ Current and/or previous home address	Arrest record or criminal conviction			
■ Email address	■ Date and/or time of release from custody of			
■ Phone number	ACS, DOCS, or NYPD			
	Information obtained from any surveillance			
	system operated by, for the benefit of, or at the			
	direction of the NYPD			
Demographic Information	Technology-Related Information			
Country of origin	■ Device identifier including media access			
■ Date of birth*	control (MAC) address or Internet mobile			
Gender identity	equipment identity (IMEI)*			
Languages spoken	GPS-based location obtained or derived from a			
■ Marital or partnership status	device that can be used to track or locate an			
☐ Nationality	individual*			
■ Race	Internet protocol (IP) address*			
☐ Religion	Social media account information			
☐ Sexual orientation				
Status information				
■ Citizenship or immigration status				
■ Employment status				
☐ Status as a victim of domestic violence or				
sexual assault				
Status as crime victim or witness				
Other Types of Identifying Information (list below	):			
*Type of identifying information designated by the CPO (see CPO Policies & Protocols, §3.1.1).				



9.	policies local pu	te from the Citywide Privacy Protection Policies and Protocols, what are the agency's regarding requests for disclosures from other City agencies, local public authorities or ublic benefit corporations, and third parties? Please summarize or upload a copy of the See N.Y.C. Admin. Code § 23-1205(a)(1)(c)(1).
10.		divisions of employees within the agency make disclosures of identifying information ng the approval of the privacy officer? See § N.Y.C Admin. Code § 23-1205(a)(1)(c)(4).
11.		categories of employees within the agency make disclosures of identifying information ng the approval of the privacy officer? See § N.Y.C Admin. Code § 23-1205(a)(1)(c)(4).
12.		of the agency's policies address <b>access</b> to identifying information by employees, stors, and subcontractors? See § N.Y.C. Admin Code § 23-1205(a)(4).
	•	Yes – GO TO QUESTION 13
	0	No – GO TO QUESTION 16
13.	employ	se policies state that <b>access</b> to identifying information must be necessary for the ees, contractors, and subcontractors to perform their duties? See N.Y.C. Admin Code $105(a)(4)$ .
	0	Yes – GO TO QUESTION 14
	•	No – GO TO QUESTION 16
14.		se policies implemented so that <b>access</b> is limited to the greatest extent possible, but also s the purpose or mission of the agency?
	•	Yes – GO TO QUESTION 15
	0	No – GO TO QUESTION 16



15. Describe how access is limited to the greatest extent possible while furthering the purpose or mission of the agency.
16. Summarize or upload the agency's current policies for handling proposals for disclosures to other City agencies, local public authorities, or local public benefit corporations, and third parties. See N.Y.C Admin Code § 23-1205(a)(1)(c)(2).
17. Summarize or upload the agency's current policies regarding the classification of disclosures as necessitated by the existence of exigent circumstances or as routine. See N.Y.C Admin Code § 23-1205(a)(1)(c)(3).
18. Since 2022, has the agency <b>considered or implemented</b> , where applicable, policies that minimize the collection, retention, and disclosure of identifying information to the greatest extent possible
while furthering the purpose or mission of the agency? See N.Y.C Admin Code § 23-1205(a)(3).
Yes – GO TO QUESTION 19
No – GO TO QUESTION 20
19. Summarize the policies that the agency has <b>considered or implemented</b> regarding data minimization for the collection, retention, and disclosure of identifying information. See N.Y.C Admin Code § 23-1205(a)(4).



20. Summarize the agency's use of agreements for any use or disclosure of identifying information. See N.Y.C Admin Code § 23-1205 (a)(1)(d).
21. Since 2022, describe the impact of the Identifying Information Law and any other local, state, or federal laws upon your agency's practices in relation to the collection, retention, and disclosure of identifying information (i.e., if such practices would differ in the absence of these laws). The impact can be positive or negative. See N.Y.C Admin Code § 23-1205(a)(2).
22. Describe how the current privacy policies and protocols issued by the Chief Privacy Officer, or the guidance issued by the Citywide Privacy Protection Committee affected your agency's practices in relation to the collection, retention, and disclosure of identifying information. The effects can be positive or negative. See N.Y.C Admin Code § 23-1205(a)(2).
- Proceed to the next page -



### APPROVAL SIGNATURE FOR AGENCY REPORT

#### PREPARER OF AGENCY REPORT

Name: Olga Statz

**General Counsel** Title:

ostatz@bic.nyc.gov Email:

Phone: 212-437-0510

## ELECTRONIC SIGNATURE OF AGENCY HEAD OR DESIGNEE REQUIRED BELOW

**Elizabeth Crotty** Name:

Commissioner Title:

ecrotty@bic.nyc.gov Email:

Phone: 2124370512

Date: 07/31/2024Signature: Elizabeth Crotty
Elizabeth Crotty (Jul 31, 2024 17:35 EDT)



**Describe the following types of collections.** *Note, you may have multiple collections of the same type.* 

	COLLECTIONS				
	Type of Collection	Describe the Specific Activity	Classification	Describe the agency purpose or mission served by this Collection.	
1	Human Resources and other Personnel Matters	Collections of identifying information for HR purposes and other personnel matters.	Pre-approved as routine	Performance of core administrative and human resource functions (performance evaluations, employee benefits, payroll, etc.)	
2	Law Enforcement	Collection of identifying and other information for purposes of regulatory and criminal investigation and enforcement.	Pre-approved as routine	Regulatory and criminal investigations and enforcement	
3	Legal Matters or Proceeding	Collection of identifying and other information for purposes of adjudicating notices of violation of applicable laws and rules.	Pre-approved as routine	The drafting of accusatory instruments and preparation for hearing and trial.	
4	Audit	Collection of identifying and other information for purposes of ensuring that licensees and registrants are complying with applicable disclosure and record-keeping laws and rules	Pre-approved as routine	Review of documents and answers gleaned from depositions to ensure that regulations are being followed and that licensees and registrants have been candid in their applications and renewals.	
5	Public Safety and Health	Collection of identifying information to determine that drivers employed by licensees and registrant have the required	Pre-approved as routine	Ensuring that vehicles and drivers meet regulatory and legal standards.	



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		driver license level and safety		
		training. Collection also to		
		ensure that the vehicles used		
		are properly registered, insured		
		and safe to operate.		
	Compliance	Collection of identifying and	Pre-approved as routine	Fulfilling BIC's mandate to
		other information to ensure that		regulate the trade waste removal
		regulated licensees and		and wholesale markets industries
		registrants are complying with		and ensure that the
6		applicable laws and rules with		requirements of the
		respect both to documentation		Administrative Code and the Rule
		and operations.		promulgated thereunder are
		•		followed.
	Prevention of Fraud, Waste,	Collection of identifying and	Pre-approved as routine	Fulfilling BIC's mandate to
	Abuse	other information to ensure that		regulate the trade waste removal
		licensees and registrants were		and wholesale markets industries
		candid and truthful on		and ensure that the
		applications and other required		requirements of the
7		submissions and are not		Administrative Code and the Rule
		defrauding trade waste removal		promulgated thereunder are
		customers.		followed and to ensure that
				those industries are free from
				criminality and organized crime
				influence.
	Client or Customer Service	Collection of identifying and	Pre-approved as routine	Fulfilling BIC's additional
		other information respecting		mandate to protect consumers
		licensee and registrant		who use the services of the trade
8		customer base to ensure that		waste removal industry, to
		licensees and registrants are		ensure that those customers are
		providing legally mandated		



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		service and abiding by laws and		not overcharged or otherwise
		rules respecting both operations		defrauded.
		and fee schedules		
	Response to a Request or		Pre-approved as routine	Fulfilling the requirements of
	Demand	purposes of disclosure during		applicable FOIL and discovery
9		litigation or in response to		laws.
		Freedom of Information Law		
		Requests.		
	Technology	Collection of information for the	Pre-approved as routine	Allowing IT to fulfill its function in
10		performance of IT related		the agency.
10		functions and maintaining data		
		and electronic infrastructure.		
	Strategic Initiatives	Per MOU between the agencies,	Approved by the CPO as being	Necessary to ensure the
		disclose information to DSNY in	in the best interests of the City	establishment of legally and
11		support of that agency's		logistically sound Commercial
		establishment of Commercial		Waste Zones in New York City.
		Waste Zones.		
	Office Administration	Disclose identifying information	Pre-approved as routine	Necessary for the functioning of
12		for administrative functions		the agency, including the
12		such as billing appointments,		collection of fees and the
		etc.		providing of notice.
	Records Management	Disclose to DORIS the contents	Pre-approved as routine	Compliance with applicable laws
13		of records BIC is required to		on record retention and
13		store and maintain per its		archiving.
		retention schedule.		
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	Type of Collection	Describe the Specific Activity	Classification	Describe the agency purpose or mission served by this Collection.
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**Describe the following types of disclosures.** Note, you may have multiple disclosures of the same type.

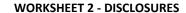
			DISCLOSURES		
	Type of Disclosure	Describe the Specific Activity	Classification	Describe the agency purpose or mission served by this Disclosure.	Was this disclosure made pursuant to an external request?
1	Human Resources and other Personnel Matters	Information disclosed while performing HR activities including on boarding, performance evaluations, payroll, etc.	Pre-approved as routine	Performance of core HR functions.	No
2	Law Enforcement	Information disclosed for purposes of investigation, prosecution or enforcement of law.	Pre-approved as routine	Performance of BIC's obligation to root out criminality and fraud in the trade waste and wholesale market industries	No
3	Legal Matters or Proceeding	Information disclosed for purposes of adjudicating notices of violation and petitions.	Pre-approved as routine	Issuing accusatory instruments and preparing for testimony by investigators and witnesses at hearing or trial.	No
4	Audit	Information disclosed to appropriate governmental authorities having authority to perform audits or review audit documents.	Pre-approved as routine	Performance of BIC's obligation to root out criminality and fraud in the trade waste and wholesale market industries.	No



5	Public Safety and Health	Information disclosed to relevant governmental entities concerned with public safety.	Pre-approved as routine	Performance of BIC's public safety obligations under law and rule.	No
6	Compliance	Information disclosed to relevant oversight agencies to comply with regulations and guidelines.	Pre-approved as routine	Provision of information to relevant state and federal entities.	No
7	Prevention of Fraud, Waste, Abuse	Information disclosed to law enforcement entities for the purpose of detecting and preventing fraud in the regulated industries.	Pre-approved as routine	Fulfilling BIC's mandate to regulate the trade waste removal and wholesale markets industries and ensure that the requirement of the Administrative Code and the rules promulgated thereunder are followed and to ensure that those industries are free from criminality or organized crime influence.	No
8	Client or Customer Service	Information disclosed respecting licensee and registrant customer base to ensure that licensees and registrants are providing legally mandated services and abiding by the laws and rules respecting their	Pre-approved as routine	Fulfilling BIC's additional mandate to protect consumers who use the services of the trade waste removal industry, to ensure that those customers are not overcharged and	No

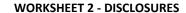


		operations and their		provided with the legally	
		fees.		mandated service.	
9	Response to a Request or Demand	Information disclosed for purposes of fulfilling obligations to provide documents during litigation and for FOIL requests.	Pre-approved as routine	Fulfilling the requirements of applicable FOIL and discovery.	No
10	Technology	Disclose identifying information in the performance of IT related functions and maintaining data and electronic infrastructure.	Pre-approved as routine	Allowing IT to fulfill its function in the agency.	No
11	Strategic Initiatives	Per MOU between the agencies, disclose information to DSNY in support of that agency's establishment of Commercial Waste Zones.	Approved by the CPO as being in the best interests of the City	In fulfillment of BIC's obligation to support DSNY in the establishment of Commercial Waste Zones.	Yes
12	Office Administration	Disclose identifying information for administrative functions such as billing, appointments, etc.	Pre-approved as routine	Necessary for the functioning of the agency, including the collection of fees and the providing of notice.	No
13	Records Management	Collect for DORIS the records BIC is required to store and maintain per its retention schedule.	Pre-approved as routine	Compliance with document retention and archiving laws and rules.	Choose an item.
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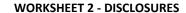


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	Type of Disclosure	Describe the Specific	Classification	Describe the agency	Was this disclosure
		Activity		purpose or mission served	made pursuant to an
				by this Disclosure.	external request?
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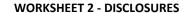


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	Type of Disclosure	Describe the Specific	Classification	Describe the agency	Was this disclosure
		Activity		purpose or mission served	made pursuant to an
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77	Choose an item.		Choose an item.		Choose an item.
78	Choose an item.		Choose an item.		Choose an item.
	Type of Disclosure	Describe the Specific	Classification	Describe the agency	Was this disclosure
		Activity		purpose or mission served	made pursuant to an
				by this Disclosure.	external request?
79	Choose an item.	[free text]	Choose an item.	[free text]	Choose an item.
80	Choose an item.		Choose an item.		Choose an item.
81	Choose an item.		Choose an item.		Choose an item.
82	Choose an item.		Choose an item.		Choose an item.
83	Choose an item.		Choose an item.		Choose an item.
84	Choose an item.		Choose an item.		Choose an item.
85	Choose an item.		Choose an item.		Choose an item.
86	Choose an item.		Choose an item.		Choose an item.
87	Choose an item.		Choose an item.		Choose an item.
88	Choose an item.		Choose an item.		Choose an item.
89	Choose an item.		Choose an item.		Choose an item.
90	Choose an item.		Choose an item.		Choose an item.
91	Choose an item.		Choose an item.		Choose an item.
92	Choose an item.		Choose an item.		Choose an item.
93	Choose an item.		Choose an item.		Choose an item.
94	Choose an item.		Choose an item.		Choose an item.
95	Choose an item.		Choose an item.		Choose an item.





96	Choose an item.	Choose an item.	Choose an item.
97	Choose an item.	Choose an item.	Choose an item.
98	Choose an item.	Choose an item.	Choose an item.
99	Choose an item.	Choose an item.	Choose an item.
100	Choose an item.	Choose an item.	Choose an item.



For each **disclosure**, select the <u>type</u> of entity **and** provide the <u>name</u> of the entity that received the identifying information.

	Type of Entity	Name of Entity
1	Federal Agency	[free text]
2	Choose an item.	
3	Choose an item.	
4	Choose an item.	
5	Choose an item.	
6	Choose an item.	
7	Choose an item.	
8	Choose an item.	
9	Choose an item.	
10	Choose an item.	
11	Choose an item.	
12	Choose an item.	
13	Choose an item.	
14	Choose an item.	
15	Choose an item.	
16	Choose an item.	
17	Choose an item.	
18	Choose an item.	
19	Choose an item.	
20	Choose an item.	
21	Choose an item.	
22	Choose an item.	
23	Choose an item.	
24	Choose an item.	
25	Choose an item.	
26	Choose an item.	
27	Choose an item.	



	Type of Entity	Name of Entity
28	Choose an item.	[free text]
29	Choose an item.	
30	Choose an item.	
31	Choose an item.	
32	Choose an item.	
33	Choose an item.	
34	Choose an item.	
35	Choose an item.	
36	Choose an item.	
37	Choose an item.	
38	Choose an item.	
39	Choose an item.	
40	Choose an item.	
41	Choose an item.	
42	Choose an item.	
43	Choose an item.	
44	Choose an item.	
45	Choose an item.	
46	Choose an item.	
47	Choose an item.	
48	Choose an item.	
49	Choose an item.	
50	Choose an item.	
51	Choose an item.	
52	Choose an item.	
53	Choose an item.	
54	Choose an item.	
55	Choose an item.	
56	Choose an item.	



	Type of Entity	Name of Entity
57	Choose an item.	[free text]
58	Choose an item.	
59	Choose an item.	
60	Choose an item.	
61	Choose an item.	
62	Choose an item.	
63	Choose an item.	
64	Choose an item.	
65	Choose an item.	
66	Choose an item.	
67	Choose an item.	
68	Choose an item.	
69	Choose an item.	
70	Choose an item.	
71	Choose an item.	
72	Choose an item.	
73	Choose an item.	
74	Choose an item.	
75	Choose an item.	
76	Choose an item.	
77	Choose an item.	
78	Choose an item.	
79	Choose an item.	
80	Choose an item.	
81	Choose an item.	
82	Choose an item.	
83	Choose an item.	
84	Choose an item.	
85	Choose an item.	



	Type of Entity	Name of Entity
86	Choose an item.	[free text]
87	Choose an item.	
88	Choose an item.	
89	Choose an item.	
90	Choose an item.	
91	Choose an item.	
92	Choose an item.	
93	Choose an item.	
94	Choose an item.	
95	Choose an item.	
96	Choose an item.	
97	Choose an item.	
98	Choose an item.	
99	Choose an item.	
100	Choose an item.	



**OPTIONAL QUESTION:** Using the table below, describe any proposals for disclosures of identifying information that your agency declined to approve.

	Type of Entity that Requested the Identifying Information	Name of the Entity	Reason for the Request	Description of Agency's Rationale for Rejection
1	Choose an item.	[free text]	[free text]	[free text]
2	Choose an item.			
3	Choose an item.			
4	Choose an item.			
5	Choose an item.			
6	Choose an item.			
7	Choose an item.			
8	Choose an item.			
9	Choose an item.			
10	Choose an item.			
11	Choose an item.			
12	Choose an item.			
13	Choose an item.			
14	Choose an item.			
15	Choose an item.			
16	Choose an item.			
17	Choose an item.			
18	Choose an item.			
19	Choose an item.			
20	Choose an item.			
21	Choose an item.			
22	Choose an item.			
23	Choose an item.			
24	Choose an item.			
25	Choose an item.			



	Type of Entity that Requested the Identifying Information	Name of the Entity	Reason for the Request	Description of Agency's Rationale for Rejection
26	Choose an item.	[free text]	[free text]	[free text]
27	Choose an item.			
28	Choose an item.			
29	Choose an item.			
30	Choose an item.			
31	Choose an item.			
32	Choose an item.			
33	Choose an item.			
34	Choose an item.			
35	Choose an item.			
36	Choose an item.			
37	Choose an item.			
38	Choose an item.			
39	Choose an item.			
40	Choose an item.			
41	Choose an item.			
42	Choose an item.			
43	Choose an item.			
44	Choose an item.			
45	Choose an item.			
46	Choose an item.			
47	Choose an item.			
48	Choose an item.			
49	Choose an item.			
50	Choose an item.			
51	Choose an item.			
52	Choose an item.			
53	Choose an item.			



	Type of Entity that Requested the Identifying Information	Name of the Entity	Reason for the Request	Description of Agency's Rationale for Rejection
54	Choose an item.	[free text]	[free text]	[free text]
55	Choose an item.			
56	Choose an item.			
57	Choose an item.			
58	Choose an item.			
59	Choose an item.			
60	Choose an item.			
61	Choose an item.			
62	Choose an item.			
63	Choose an item.			
64	Choose an item.			
65	Choose an item.			
66	Choose an item.			
67	Choose an item.			
68	Choose an item.			
69	Choose an item.			
70	Choose an item.			
71	Choose an item.			
72	Choose an item.			
73	Choose an item.			
74	Choose an item.			
75	Choose an item.			
76	Choose an item.			
77	Choose an item.			
78	Choose an item.			
79	Choose an item.			
80	Choose an item.			
81	Choose an item.			



	Type of Entity that Requested the Identifying Information	Name of the Entity	Reason for the Request	Description of Agency's Rationale for Rejection
82	Choose an item.	[free text]	[free text]	[free text]
83	Choose an item.			
84	Choose an item.			
85	Choose an item.			
86	Choose an item.			
87	Choose an item.			
88	Choose an item.			
89	Choose an item.			
90	Choose an item.			
91	Choose an item.			
92	Choose an item.			
93	Choose an item.			
94	Choose an item.			
95	Choose an item.			
96	Choose an item.			
97	Choose an item.			
98	Choose an item.			
99	Choose an item.			
100	Choose an item.			