


Name of Contractor	Samuel Field YM & YWHA, Inc.
Description of the purpose(s) for which Contractor will receive/access PII	<p>Description of the purpose(s) for which Contractor will receive/access PII</p> <p>Samuel Field YM & YWHA has worked to identify key PII, as defined in 34 CFR § 99.3, that it must receive to provide contracted services to youth and families. Services provided will include counseling and interventions with key personnel including social workers, to develop and implement afterschool activities, special community events, family engagement and referral to community resources and linkages. The collection of key PII will allow for us to appropriately record and track enrollment, attendance data and facilitate counseling. PPI data collection will be collected through the program’s informed consent application and key PII will include [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] for this proposal submission.</p> <p>The purpose of the collection of student and family names will be used to ensure record attendance and safe sign-outs of the program daily. This data is essential to ensure that our program provides a safe and secure environment for all students that we serve. Key staff will utilize this data to make sure that students are appropriately accounted for at all times while scheduled to be in programming. It is imperative that attendance data is collected as it directly informs the culmination of key program outcomes, including the number of students that participate in services for the target hours of service as well as attendance performance indicators for specific categories. Due to the nature of the service, it is possible that counseling notes will including PII as defined as “Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty;”. These notes are necessary to ensure continued, effective mental health support for those receiving the services.</p> <p>Please describe how data privacy and security risks will be mitigated in a manner that does not compromise the security of the data:</p> <p>Samuel Field YM&YWHA invested in a highly secure system, [REDACTED] [REDACTED] is a system that requires [REDACTED] that will prompt [REDACTED] change frequently for protection. Given the level of staff and administrative usage, [REDACTED]</p> <p>All data is naturally encrypted while being stored in a [REDACTED] [REDACTED] In addition, there are [REDACTED] to assess if there are any [REDACTED] Samuel Field YM & YWHA will maximize our database record system though while always ensuring HIPPA guidelines are the priority when working with clients. Based on our experiences, our security measures in place have shown much success and have never experienced a situation where we have been greatly compromised. Even in the case of a potential security breach, Samuel Field YM & YWHA is equipped to handle this and will appropriately notify necessary parties involved of this issue.</p>

<p>Type of PII that Contractor will receive/access (Write Yes or N/A on the lines next to each item)</p>	<p><input type="checkbox"/>_yes___ Student PII</p> <p><input type="checkbox"/>_no___ APPR Data</p>
<p>Contract Term</p>	<p>Contract Start Date: <u>7/1/2021</u></p> <p>Contract End Date: <u>6/30/2026</u></p>
<p>Subcontractor Written Agreement Requirement (Write Yes or N/A on the lines next to each item)</p>	<p>Contractor will not utilize Subcontractors without a written contract that requires the Subcontractors to adhere to, at a minimum, materially similar data protection obligations imposed on the contractor by state and federal laws and regulations, and the Contract. (check applicable option)</p> <p><input type="checkbox"/>_Yes___ Contractor will not utilize Subcontractors.</p> <p><input type="checkbox"/>_no___ Contractor will utilize Subcontractors.</p>
<p>Data Transition and Secure Destruction</p>	<p>Upon expiration or termination of the Contract, Contractor shall:</p> <ul style="list-style-type: none"> • Securely transfer data to NYSED, or a successor contractor at NYSED's option and written discretion, in a format agreed to by the parties. • Securely delete and destroy data.
<p>Challenges to Data Accuracy</p>	<p>Parents, teachers, or principals who seek to challenge the accuracy of PII will do so by contacting NYSED. If a correction to data is deemed necessary, NYSED will notify the Contractor. Contractor agrees to facilitate such corrections within 21 days of receiving NYSED's written request.</p>

<p>Secure Storage and Data Security (Write Yes or N/A on the lines next to each item)</p>	<p>Please describe where PII will be stored and the protections taken to ensure PII will be protected: (check all that apply)</p> <p><input type="checkbox"/> yes ___ Using a cloud or infrastructure owned and hosted by a third party.</p> <p><input type="checkbox"/> no ___ Using Contractor owned and hosted solution</p> <p><input type="checkbox"/> Other:</p> <p>Please describe how data privacy and security risks will be mitigated in a manner that does not compromise the security of the data:</p> <p>Samuel Field YM&YWHA shall maintain appropriate administrative, physical, and technical safeguards for protection of the security, confidentiality and integrity of the Data. We shall not modify Data, disclose Data except as permitted herein, or access Data except as permitted herein.</p>
<p>Encryption</p>	<p>Data will be encrypted while in motion and at rest.</p>
<p>Certification</p>	<p>Contractor certifies that Contractor will comply with applicable State and Federal laws, rules, and regulations.</p>

<p>Contractor's Name</p>	<p>Samuel Field YM & YWHA</p>
<p>Signature</p>	
<p>Printed Name</p>	<p>Danielle Ellman</p>
<p>Title</p>	<p>CEO</p>
<p>Date</p>	<p>3/17/2021</p>