



CITY OF MOUNT VERNON, N.Y.

Mayor Office

SHAWYN PATTERSON-HOWARD, MPA
Mayor

City Hall, One Roosevelt Square
Mount Vernon, NY, 10550
(914) 665-2362 – Fax: (914) 665-6173

Juan Perez
Commissioner Management Services

July 9, 2026

Honorable City Council
One Roosevelt Square
Mount Vernon, New York 10550
(Through the Office of the Mayor)

Re: Adopting the Policy for Protecting Personally Identifiable Information (PII) in line with the **New York State SHIELD Act and other privacy laws**

Dear Council Members,

The Department of Management Services respectfully requests that the City Council adopt the attached *Policy for Safeguarding Personally Identifiable Information (PII)* for the City of Mount Vernon.

This policy is aligned with the **New York State Stop Hacks and Improve Electronic Data Security (SHIELD) Act**, the Health Insurance Portability and Accountability Act (HIPAA), the New York Personal Privacy Protection Law, and applicable provisions of the Freedom of Information Law (FOIL).

Compliance with the SHIELD Act's reasonable safeguards requirement is essential to protect the residents, employees, contractors, and visitors whose personal information the City collects, uses, and stores. This policy complements the Computer System Security Breach Notification Policy previously adopted under New York State Technology Law Section 208 — where the breach policy governs the City's response after an incident, this policy sets the safeguards to prevent incidents from occurring in the first place.

The proposed policy sets clear standards for:

- Defining Personally Identifiable Information (PII) and Sensitive PII, including data protected under HIPAA.
- Classifying data using the GovEx Open Data Privacy framework (Open, Sensitive, Restricted) as a guide for daily handling decisions.
- Securing PII in both electronic and physical forms through encryption, multi-factor authentication, locked storage, and approved city platforms like SharePoint and OneDrive.
- Restrict access using least-privilege and role-based access controls (RBAC) managed via Microsoft 365 / Entra ID.
- Requiring quarterly access reviews and recertification, along with a defined joiner-mover-leaver process coordinated between Human Resources and Management Services.
- Governing privileged administrative accounts through separation of duties, MFA, inventory management, and enhanced monitoring.
- Maintaining audit logs of access to systems that store PII, with periodic reviews for anomalies; and
- Maintaining consistent standards across all City departments, employees, contractors, interns, and volunteers.

“The Jewel of Westchester”



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Implementing this policy will protect the public from identity theft and unauthorized disclosures, strengthen the City's dedication to accountability, and ensure Mount Vernon stays in compliance with State and federal privacy laws.

I respectfully ask the Council to review and approve the attached legislation. This policy is an essential step in safeguarding both City operations and the private information we handle. All funds received should be deposited into A2655.2 minor sales.

Advantages of implementing this policy

- Ensures Mount Vernon complies with the New York State SHIELD Act, HIPAA, and related privacy laws.
- Ensures the protection of residents, employees, and contractors against identity theft, fraud, and unauthorized disclosure of sensitive information.
- Establishes a clear, consistent framework for how PII is collected, stored, accessed, shared, and disposed of.
- Reduces the risk and potential cost of a data breach by implementing encryption, multi-factor authentication, and least-privilege access.
- Ensures City departments follow the same standard procedures for handling PII and Sensitive PII; and
- Supports the City's Breach Notification Policy by emphasizing prevention over response.

Thank you for your consideration.

Respectfully,

Juan Perez
Management Services Commissioner

cc: Shawyn Patterson-Howard, Mayor
cc: Brian Johnson, Corporation Council
cc: Darren Morton, Comptroller