



Definition of PII

Information that identifies, links, relates, is unique to, or describes the individual, such as name, SSN, date and place of birth, mother's maiden name, biometric records, home phone numbers, other demographic, personnel, medical, and financial information, or any other PII which is linked or linkable to a specified individual.

This definition of PII is not anchored to any single category of information or technology. Non-PII can become PII when information is publically available and when combined could identify an individual.

Collecting PII

It is **YOUR** responsibility to:

- Ensure that the information entrusted to you in the course of your work is secure and protected. PII must only be accessible to those with an "official need to know."
- Minimize the use, display or storage of SSNs and all other PII. The DoD ID number or other unique identifier should be used in place of the SSN whenever possible.
- Keep personal information timely, accurate and relevant to the purpose for which it was collected. Delete the information when no longer required.
- Remember to follow the DoDEA Records Management retention and disposition requirements.
- Immediately notify your supervisor if you suspect or discover that PII has been lost or compromised.

- Never include the SSN in a personnel rosters.
- Use only officially issued forms. Those that collect PII should also have a Privacy Act Statement (PAS).
- The SSN must not be posted on any public facing websites.
- Continued collection of the SSN must meet one of the acceptable use criteria and be formally justified in writing.

Technology

- Keep your laptop in a secure government space or secured under lock and key when not in use.
- Laptops and mobile electronic equipment must have full disk/Data at Rest (DAR) encryption.
- Mark all Government furnished external drives or mobile media containing PII with "FOUO-Privacy Sensitive."
- Do not create, store or transmit PII on IT equipment when the information is not encrypted.
- Never store PII on personal devices.
- Do not maintain PII on a public website or unauthorized electronic medium.
- Do not leave your laptop unattended in a car or car trunk, even if the car and trunks are locked.
- Do not check your laptop with or in your luggage when you travel.

Email

- Emails containing PII must be digitally signed and encrypted.
- Under no circumstance should PII be transmitted from a Government server to a private server email address.
- As a best practice, ensure the email subject line contains "FOUO" if the email contains PII.
- Ensure the body of the email containing PII includes the following warning: "FOR OFFICIAL USE ONLY."
- Ensure you are sending the email to the correct recipients and all have an official need to know.

- Ensure you know what your attachment contains (i.e., PII) prior to sending. Be sure to check all tabs if the attachment is an Excel spreadsheet.
- Phishing continues to be on the rise. Ensure you only open and respond to legitimate emails.

Printed Material

- Verify the printer location prior to printing a document containing PII.
- Ensure all printed documents with PII are properly marked with "FOR OFFICIAL USE ONLY."
- As a best practice, use a "Privacy Act Cover Sheet" (DD Form 2923) as a cover when handling PII.
- Safeguard all documents when not in your direct possession by prohibiting access by those without an official need to know.

Scanning

Scanned documents containing PII shall be transmitted using secure means.

Remember that "Scan to file" or "scan to network drive" functionality may be used only if the sender can verify that all users are authorized to have access to the scanned file or network share location.

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FAXing

Facsimile transmission of PII is prohibited except:

- When another more secure means is not practical.
- When a non-DoDEA process requires faxing.
- When required by operational necessity.
- When faxing Internal Government Operations PII (e.g., office phone, office email).

As a best practice, use a "Privacy Act Cover Sheet" (DD Form 2923) as a cover.

Verify receipt by the correct recipient.

External customers should be encouraged to use the US Postal Service or transmission by another secure means.

Electronic Storage Media

All Internal and removable electronic storage media must be properly marked and secured. The devices include, but are not limited to: laptops, printers, copiers, scanners, multi-function devices, hand held devices, CDs/DVDs, removable and external hard drives.

Disposal

- Disposal methods are considered adequate if records are rendered unrecognizable or beyond reconstruction (e.g., tearing, burning, melting, chemical decomposition, burying, pulping, pulverizing, shredding, or mutilation).
- Do not discard documents containing PII in trash or recycle bins.

Network Shared Drives

- For files/folders containing PII, ensure that controls are in place restricting access to only those with an official need to know.
- Limit storage of PII on shared drives whenever possible.
- Delete files containing PII when no longer needed.
- Verify that access controls/permissions are properly restored following maintenance.

Shredding

- It is highly recommended and considered a best practice to use a cross-cut shredder.
- For shredder residue size as a best practice, refer to NIST Special Publication 800-88.
- An alternative to purchasing a shredder is to contact the DoDEA logistics Division for shredding advice.
- In lieu of shredding, the use of burn bags is a recommended alternative.

PII Breach Reporting

- Report all incidents involving actual or suspected breaches/compromises of PII to the DoDEA Privacy Office within 24 hours of discovery by completing DD Form 2959 (Breach of PII Report), and emailing it to Privacy_forms@DoDEA.EDU.
- If your PII is compromised, monitor financial accounts for suspicious activity.
- If your identity is stolen, immediately visit the Federal Trade Commission website for more information and recommended actions <http://www.ftc.gov> or call 1-877-IDTHEFT.

Training and Compliance

All DoDEA personnel, including contractors and educators, must complete the Privacy Act & Safeguarding Personally Identifiable Information annual training.

Mandatory training for DoDEA personnel is available through the Cornerstone On-Demand, Defense Acquisition University portal:

<https://www.dodea.edu/employees/CSOD/index.cfm>

Additional training is available on the DoDEA Privacy website at:

<https://www.dodea.edu/Offices/ExecutiveServices/Privacy-Information-Collections-and-Forms-Management.cfm>.

**DoDEA personnel who mishandle PII are required to take refresher training.*

- The majority of PII breaches are due to human error.
- SSNs are the most valuable commodity to an identity thief.
- Insider threat continues to grow; risk is greatest when PII is stolen by a hacker or thief.