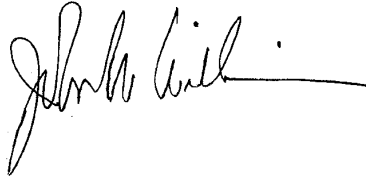


For: FFAS Employees

**Requirements for Shipping Personally Identifiable Information (PII)
Through Physical Transportation Systems**

Approved by: Deputy Administrator, Management



1 Overview

A Background

A comprehensive review:

- was conducted to determine the best practices, processes, and procedures for moving PII through the physical transportation systems
- focused on internal (intra-facility) and external (Federal Express (FedEx) and United States Postal Service (USPS)) delivery systems.

Note: Physical transportation is defined as any non-electronic method of moving information through a shipping or delivery system.

B Purpose

This notice:

- implements new FSA requirements for shipping PII through both internal and external physical transportation systems
- obsoletes FSA-6 and KC-367 and replaces them with AD-2059 (optional).

Note: AD-2059 is available from the FFAS Employee Forms Online Website at <http://intra3.fsa.usda.gov/dam/ffasforms/forms.html>.

Disposal Date	Distribution
July 1, 2008	All FAS, FSA, and RMA employees; State Offices relay to County Offices

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1 Overview (Continued)

C Contacts

If there are questions about this notice, contact John W. Underwood, Chief, Management Services Division, Kansas City Administrative Services Branch, Information Management Section at john.underwood@kcc.usda.gov or 816-926-6992.

2 PII Determination

A Determining PII

Agencies shall determine whether information to be shipped contains PII.

Important: Because of the complexity of the issues involved, the sending agency is encouraged to seek advice, guidance, and assistance from their respective FSA Freedom of Information Act/Privacy Act Service Center. See http://www.fsa.usda.gov/Internet/FSA_File/foiaservicecenters.pdf.

B Data Types

The comprehensive review identified a core listing of PII data types. The following table serves as a quick reference guide for identifying the most common PII data types currently moving through physical transportation systems.

Note: The core list **must not** be viewed as encompassing all PII data types. If the information being shipped contains any 1 of the data types listed, the entire shipment shall be considered to be PII.

Item	Data Type
1	Social Security Number
2	Financial Information Examples: Bank account numbers/information, financial transaction histories, credit reports/credit worthiness information, credit/debit card numbers, and personal ID numbers.
3	Tax Information
4	Date of Birth
5	Loan/Loan Application Information
6	Personal Contact Information Examples: Home address, phone number, and e-mail address.
7	Medical Information (includes disability information and sick leave usage)
8	Driver's License Number
9	Producer Acreage Information
10	Producer Head of Livestock Information

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2 PII Determination (Continued)

B Data Types (Continued)

Item	Data Type
11	Employee/Producer Racial Identity Information
12	Employee/Producer Investigator Information
13	Employee Disciplinary Information
14	Insurance Information
15	Legal/Lawsuit Information
16	Agency Internal Work Product Examples: Internal personnel rules and practices; privileged interagency or intra-agency memorandums or letters; and State, County, Field, or National Office correspondence.
17	Procurement/Contract Information and/or Information on Other Contractors/Potential Contractors
18	Information on Individuals or Organizations About Whom the USDA Keeps Information
19	USDA Proprietary Documentation/Materials Examples: Flow charts, codes, software, computer instructions, techniques, models, information, and diagrams.
20	Private Agency Internal Trade Secrets, Business Records, and/or Marketing Information

3 Physical Transportation Procedures

A Shipment Approval Process

The entry of PII into a physical transportation system shall be taken to indicate that a manager or designated representative (individuals authorized by management to approve entry of PII into a physical transportation system) from the sending organization:

- is fully aware of the actual PII contained within the shipment
- approves entry of PII into the physical transportation system
- accepts full responsibility and accountability for entering PII into the internal or external physical transportation system
- has ensured that PII in electronic format has been encrypted (providing the data system allows encryption).

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3 Physical Transportation Procedures (Continued)

A Shipment Approval Process (Continued)

Important: The decryption key shall:

- be provided by telephone after the receiver confirms receipt of the shipment
- not be:
 - included in the same shipment
 - provided by e-mail.

Note: AD-2059 (Exhibit 1) may be completed as required. AD-2059 is for use with any mailroom that requires a signed form to enter PII and/or non-PII into the physical transportation system, for example, mailrooms located in Washington, DC and Kansas City.

B Shipment Preparation Requirements

The following provides requirements for PII shipments. PII shipments shall be:

- sufficiently sealed to prevent inadvertent opening
- sealed in a manner that signs of tampering will be easily visible.

Sending agency manager, or designated representative, shall do the following.

Step	Action
1	Seal PII items in a new (unused) opaque envelope, package, or box.
2	<p>If the items being transported have the potential to break the first sealed PII envelope, package, or box (such as bulky/irregularly shaped objects, objects with sharp edges, objects that easily shift inside the envelope, package, or box, over stuffed envelopes, packages, or boxes, etc.), the first sealed PII envelope, package, or box shall be placed inside a second, new (unused) opaque envelope, package, or box and sealed again (double sealed).</p> <p>The second opaque envelope, package, or box may be provided by the mailing vendor (such as FedEx or USPS).</p> <p>Note: Electronic media containing PII (such as data tapes, DVD's, CD's, etc.) shall be double sealed before entry into a physical transportation system.</p>
3	<p>Label the first (and second when applicable) envelope, package, or box with sender's and recipient's address.</p> <p>Note: Under no circumstances should the shipment be externally labeled on the first or second envelope, package, or box to indicate or identify that the shipment contains PII.</p>
4	Label individual electronic media containing PII as U.S. Government Property. Affix a label stating "U.S. Government Property. If Found Return To (sender's address)."
5	Label each individual box bound for a FRC as U.S. Government Property. Affix a label stating "U.S. Government Property. If Found Return To (sender's address)."

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3 Physical Transportation Procedures (Continued)

C Approved Shipment Methods

The following table provides approved PII shipping methods.

Method	Instruction
Internal (Intra-Facility)	<p>Deliver to single, stand-alone facilities and facilities that are in close physical proximity to each other.</p> <p>Example: Compound-style buildings or facilities in the same city that are supported by the same mailroom.</p>
Hand-Carried	Sender shall take information directly to receiver.
Courier Service	Courier Service shall take (hand-carry) information directly to receiver.
Mailroom	<p>PII may be placed into the internal physical transportation system.</p> <p>Important: Notification of Shipment. When using a mailroom, sender shall notify receiver by e-mail to expect delivery of PII.</p> <p>Follow-up Contact. When using a mailroom, sender shall contact receiver by e-mail on, but not to exceed 1 workday after, expected delivery date to confirm PII has successfully reached the intended destination.</p>
External	<p>PII shall be shipped externally using a transport method that provides:</p> <ul style="list-style-type: none"> • for a positive chain of custody • the ability to track pickup, receipt, transfer, and delivery. <p>Note: Approved external mailing methods are:</p> <ul style="list-style-type: none"> • FedEx • USPS. <p>Exception: Physical transport of a single envelope sent to a single recipient (such as, transaction statements, IRS-1098's, CCC-1099's or IRS-1099's) shall be accomplished using standard First-Class Mail® offered by USPS.</p>
FedEx	<p>USDA has negotiated a Blanket Purchase Agreement (BPA) with FedEx. Account holders will automatically receive discounts.</p> <p>BPA with FedEx has 4 mailing options available. The option selected will depend upon the delivery speed required.</p> <ul style="list-style-type: none"> • FedEx Priority Overnight® • FedEx Standard Overnight® • FedEx 2Day® • FedEx Express Saver® (3 Day).

3 Physical Transportation Procedures (Continued)

C Approved Shipment Methods (Continued)

Method	Instruction
USPS	<p>USPS has 3 mailing options. The option selected will depend upon the weight of envelope and delivery speed required.</p> <ul style="list-style-type: none"> • Express Mail® (Overnight) • Priority Mail® with Certified Mail Option (2 Day) <p>Note: These methods shall be used for envelopes weighing 14 ounces or more.</p> <ul style="list-style-type: none"> • First-Class Mail® with Certified Mail Option (3 Day). <p>Note: This method may be used only for envelopes weighing 13 ounces or less.</p>

D Using FedEx Method

The preferred method for external mailing, because of cost, is FedEx. The BPA between USDA and FedEx can be activated by calling 800-645-9424 and providing your FedEx account number. FedEx will discuss options for making payment.

If an office does not have a FedEx account, an account can quickly be established by contacting Monica Fleischmann, FedEx Worldwide Account Manager, Government Sales at either of the following:

- telephone at 703-866-2014
- cell phone at 703-608-9264.

Note: FedEx and USPS are the **only** approved methods for physical transport of PII. For non-PII data, it is up to the individual offices to determine the most cost effective method for sending non-PII through a physical transportation system. However, because of the favorable terms of the FedEx BPA, offices are encouraged to research the possibility of reducing cost by using the FedEx BPA for non-PII shipments.

AD-2059, Identification and Approval of Information Shipped Via FedEx or USPS

AD-2059 may be completed for PII shipments.

AD-2059 <small>(08-01-07)</small>				U. S. DEPARTMENT OF AGRICULTURE			
IDENTIFICATION AND APPROVAL OF INFORMATION SHIPPED VIA FEDEX OR USPS							
INSTRUCTIONS: If there is a Federal Mailroom / Centralized Shipping Facility at your location, outgoing Federal Express or USPS items may be processed through that facility. This form may be used to enter shipments into the Physical Transportation System. Shipments shall be double sealed (when required). If the item is too large for an envelope/pouch, the package shall be appropriately banded or secured to prevent the contents from falling out during shipment.							
1. REQUESTER (<i>Type or Print First and Last Name</i>)		2. AGENCY <input type="checkbox"/> FAS <input type="checkbox"/> FSA <input type="checkbox"/> NRCS <input type="checkbox"/> OCIO <input type="checkbox"/> RD <input type="checkbox"/> RMA <input type="checkbox"/> Other:			3. FACILITY LOCATION (<i>City/State</i>)		
4. ORGANIZATIONAL ENTITY (<i>Show State/county name or provide full acronym, highest to lowest structure levels; i.e., FSA-ITSD-ADC-PARMO</i>)		5. ROOM NO., CUBE ASSIGNMENT, OR MAIL STOP CODE (<i>As applicable</i>)			6. PHONE NO. <i>(Include Area Code and Extension)</i>		
7. IDENTIFICATION AND TYPE OF INFORMATION BEING SHIPPED							
7a. DESCRIPTION OF ITEM(S) BEING SHIPPED: 							
7b. Does the shipment contain Personally Identifiable Information (PII)? No <input type="checkbox"/> <i>Go to Item 7d.</i> Yes <input type="checkbox"/> <i>Complete blocks 7c and 7d.</i>							
7c. STEPS TAKEN TO PROTECT THE DATA (<i>Check as applicable</i>) <input type="checkbox"/> Electronic data has been encrypted <input type="checkbox"/> Shipment(s) properly and securely packaged (double sealed) <input type="checkbox"/> Other (Specify):					7d. YOUR E-MAIL ADDRESS NOTE: <i>Enter to activate the FedEx/USPS online tracking system (PII data) or to receive immediate e-mail notification upon delivery.</i>		
8. SHIPPING ADDRESS and SERVICE REQUESTED: DO NOT use Post Office (PO) Box numbers.							
8a. COMPANY NAME or OFFICE/DIVISION							
8b. ATTENTION <i>(Include Individual's Name and Stop Code, as Applicable)</i>							
8c. BUILDING or ROOM NO.							
8d. STREET ADDRESS							
8e. CITY, STATE, ZIP							
8f. DESTINATION PHONE <i>(Include Area Code and Extension)</i>							
8g. REQUIRED DELIVERY SERVICE (<i>Check one</i>): <input type="checkbox"/> FedEx Priority Overnight® (delivery by 10 a.m. the next day) <input type="checkbox"/> USPS Express Mail® (overnight) <input type="checkbox"/> FedEx Standard Overnight® (delivery by 3 p.m. the next day) <input type="checkbox"/> USPS Priority Mail® with Certified Mail Option (2-day service) <input type="checkbox"/> FedEx 2Day® (2-day service) <input type="checkbox"/> USPS First-Class Mail® with Certified Mail Option (3-day service) <input type="checkbox"/> FedEx Express Saver® (3-day service) <input type="checkbox"/> FedEx Saturday Delivery (available only with FedEx Priority Overnight® and FedEx 2Day®)							
8h. JUSTIFICATION FOR USING FEDEX/USPS SHIPPING 							
9. CERTIFICATION AND APPROVAL OF SHIPMENT BY MANAGER OR DESIGNATED REPRESENTATIVE							
<i>By signing, I certify that I am aware of the contents of the shipment and am aware of the shipment's Personally Identifiable Information (PII) status (if applicable) and approve the shipment for entry into the Physical Transportation System.</i>							
9a. NAME (<i>Type or Print</i>)		9b. TITLE		9c. SIGNATURE		9d. DATE	
10. TO BE COMPLETED BY SHIPMENT PROCESSOR							
10a. NAME (<i>Type or Print</i>)		10b. STAMP DATE HERE		10c. AFFIX FEDEX/USPS TRACKING NO. STICKER(S) HERE			