



United States
Department of
Agriculture

Office of the Chief
Information Officer

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Washington, DC
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TO: Colien Hefferan
Administrator, CSREES

FROM: Boyd K. Rutherford
Assistant Secretary for Administration

Charles R. Christopherson, Jr.
Chief Financial Officer
Chief Information Officer

OCT 22 2007

SUBJECT: Policy Clarification for Memo on Protecting Personally Identifiable
Information, dated September 17, 2007

In response to your September 28, 2007 memorandum requesting clarification on the Department's social security number policy guidance, the tax identification number (TIN) is categorized as personally identifiable information (PII). The different definitions of what constitutes a TIN was a factor in the decision to categorize this element as PII (e.g., a sole proprietor).

Agencies that are required to use the TIN pursuant to statute must obtain an annual policy exception from the Chief Information Security Officer (CISO). Your approved request will be sent by the CISO under separate cover.