



United States
Department of
Agriculture

SEP 21 2007

Office of the Chief
Information Officer

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Washington, DC
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TO: Clay Johnson III
Deputy Director for Management
Office of Management and Budget

FROM: Charles R. Christopherson, Jr.
Senior Agency Official for Privacy

SUBJECT: Safeguarding Against and Responding to the Breach of
Personally Identifiable Information, M-07-16

The U.S. Department of Agriculture (USDA) has taken the following actions in response to meeting the requirements of Office of Management and Budget (OMB) Memorandum 07-16, dated May 22, 2007. In May 2007, Secretary Johanns directed that USDA establish a Personally Identifiable Information (PII) Taskforce. This task force is led by the Chief Financial and Information Officer and the Assistant Secretary for Administration.

This task force completed a review of all existing policies and procedures within the Department and developed a comprehensive project plan to safeguard PII data at USDA, and is working diligently to implement this plan which includes:

- reducing the volume of collected and retained information to the minimum necessary;
- limiting access to only those individuals who must have such access; and
- using encryption, strong authentication procedures, and other security controls.

USDA continues to review its holdings of PII data, in whatever format, to determine the extent and to reduce these holdings. As part of the certification and accreditation process, USDA evaluates the information contained in the security categorization level and the privacy impact assessment to ensure that the information is consistent and that the appropriate security requirements and controls are implemented.

Other specific actions taken this year include a review of completed privacy impact assessments (PIAs) and where applicable, published system of records notices (SORN) for the systems included in our Federal Information Security Management Act (FISMA) inventory.

USDA has also awarded a BPA for an encryption product which is mandatory throughout the Department. This product, coupled with the other initiatives in the Department and management attention, provides a level of assurance that the Department is making significant progress in meeting the requirements outlined above.

As a part of the plan to safeguard PII data, the task force has developed a breach notification policy, and is in the final stages of implementing this policy. In addition, several efforts within the Department (including the implementation of OMB Circular A-123, Appendix A requirements) culminate in the creation of enforceable rules of behavior for individuals that have access to PII data.

If you have any questions, please do not hesitate to contact me directly at 202-720-5539.
