



**Functional Series [500](#)
Management Services**

INTERIM UPDATE 06-09

SUBJECT: USAID Compliance with OMB M-06-16

NEW MATERIAL: On June 23, 2006, the Office of Management and Budget (OMB) issued Memorandum M-06-16, which requires that all Federal Agencies properly safeguard their information assets that contain personally identifiable information (PII). To comply with M-06-16, the Chief Information Security Officer (CISO) and the Chief Privacy Officer (CPO) are updating the definition of System Owner, in the Automated Directives System (ADS) Glossary, to include the concept of "data owners" (individuals who are responsible for the daily maintenance and operational management, including the gathering of, access control to, and dissemination of small amounts of PII). Effective immediately, references to System Owner in the ADS will also include data owners.

EFFECTIVE DATE: 08/04/2006

ATTACHMENTS: 1. [Responsibilities](#)
2. [Memorandum](#)
3. [OMB M-06-16](#)

POLICY

**USAID/General Notice
AA/M
08/07/2006**

Subject: USAID Compliance with OMB M-06-16

On June 23, 2006, the Office of Management and Budget (OMB) issued Memorandum M-06-16, which requires that all Federal Agencies properly safeguard their information assets that contain personally identifiable information (PII).

When OMB issued M-06-19 on July 12, 2006, it defined personally identifiable information to be: "any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual".

OMB directed the National Institute of Standards and Technology (NIST) to provide a checklist for the protection of PII, emphasizing the protection of PII that was remotely accessed or stored. OMB recommended four additional security controls for the protection of PII beyond the NIST checklist. OMB also directed that within 45 days, by August 7, 2006, the Agency's Inspector General evaluate the Agency's implementation of the additional security controls and the NIST security controls from the checklist to ensure that all Federal Agencies are properly safeguarding the PII entrusted to them.

To comply with M-06-16, the Chief Information Security Officer (CISO) and the Chief Privacy Officer (CPO) are updating the definition of System Owner, in the Automated Directives System (ADS) Glossary, to include the concept of "data owners" (individuals who are responsible for the daily maintenance and operational management, including the gathering of, access control to, and dissemination of small amounts of PII). Effective immediately, references to System Owner in the ADS will also include data owners.

System Owners were previously required to categorize their USAID information systems as directed in ADS Chapter 545.3.1.4(b). To comply with M-06-16, System Owners may not categorize information systems that contain PII as "low", the categorization must be either "moderate" or "high." For all systems containing PII, the System Owner must apply the security controls detailed in the attached Excel spreadsheet.

The Privacy Act responsibilities assigned to USAID personnel to accommodate the requirements of M-06-16 are included in the attached Word document.

The CISO and CPO will update ADS Chapters 545 and 508 to reflect this new policy from OMB and NIST within the next few months.

Point of Contact: Please direct any questions concerning this Notice to Michael Hughes, AA/M, (703) 666-1312, or to isso@usaid.gov or privacy@usaid.gov.

Notice 0818

File Name	Notice Date	Effective Date	Editorial Revision Date	ADS CD No.	Remarks
IU5_0609_080906_cd45	08/07/2006	08/04/2006		ADS CD 45	This IU will remain active until the policy in it is incorporated into an ADS Series 500 chapter.

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