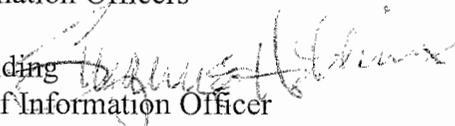


DEC 18 2007



UNITED STATES DEPARTMENT OF COMMERCE
Chief Information Officer
Washington, D.C. 20230

MEMORANDUM FOR Chief Information Officers

FROM: Suzanne Hilding 
Acting Chief Information Officer

SUBJECT: Data Extract Log and Verify Requirement

To ensure that personal and other sensitive information is protected, Commerce is committed to fully implementing the data extract log and verify requirement in OMB Memorandum M-06-16, Protection of Sensitive Agency Information, dated June 23, 2006, and reiterated in OMB Memorandum M-07-16, dated May 22, 2007.

This requirement, which was incorporated in the Department of Commerce IT Security Program Policy and Minimum Implementation Standards, as revised February 6, 2007, requires that operating units, "Log all computer-readable data extracts from databases holding sensitive information and verify each extract including sensitive data has been erased within 90 days or determine that its use is still required."

The Office of the Chief Information Officer has determined that the Privacy Impact Assessment (PIA) review and approval process is the most effective way to implement and document this requirement. Operating units should take the following actions:

- Review and update all existing Privacy Impact Assessments (PIAs), specifically describing how the log and verify requirement has been implemented for the system. If a satisfactory technical solution has not been identified or implemented, indicate the manual method that is being used.
- Develop PIAs, which address this requirement, for all investigation and law enforcement case files and human resources database systems, regardless of whether they were previously exempt from the PIA requirement because they had not been recently modified or contained information only about federal employees.

Submit the draft PIAs to Diana Hynek (dhynek@doc.gov) no later than **March 28, 2008**. Diana can be contacted by e-mail or at 202-482-0266.