

DOE HS-31 Policy for submission of PII information
Effective immediately

In August 2006, the Deputy Director of the Office of Security and Safety Performance Assurance issued a memorandum entitled "Protection of Electronic Data Containing Controlled Unclassified Information (CUI)". In November of 2006, DOE CIO issued Guidance CS-38A, "Protection of Sensitive Unclassified Information, Including Personally Identifiable Information". These documents delineate controls necessary to protect sensitive categories of information. A review of HSS systems has identified that the radiation exposure records submitted to the Radiation Exposure Monitoring System (REMS) under DOE Order 231.1A and DOE Manual 231.1-1A is subject to these protections and should be encrypted under this policy. In the past it has been acceptable for the organizations to send the data files on diskette or CD in the mail without encryption. Under the new policy these records should be categorized as Personally Identifiable Information (PII) and when transferred to removable media (e.g. diskette or CD) must be encrypted during transport to DOE.

In response to this policy, DOE HS-31 has developed the following acceptable methods for the submission of radiation exposure data files containing CUI to the REMS database:

1. Encrypt the data file using Entrust® and send the data file on diskette or CD to REMS using regular mail or express carrier as before
2. Email the file using Entrust® email encryption to derek.hagemeyer@orise.orau.gov.

Note: Never send PII data without using a DOE-approved method of encryption.

Entrust® has been approved by DOE for encrypting and transmitting PII data and has been implemented complex-wide. Several sites have already begun to use Entrust® to submit data files to REMS, and the capability to receive, decrypt, and process these files is in place.

3. Another alternative method is to submit the data file through the U.S. Nuclear Regulatory Commission's web site for occupational radiation exposure (www.reirs.com). This site has a module that allows users to submit a data file using Secure Socket Layers (SSL) to encrypt the data file and protect it in transit to the radiation records repository. The DOE and NRC have an inter-agency agreement to share resources and technology in radiation exposure information including the submission of these data files to both the DOE and NRC.
4. When Entrust® is not available for encrypting, transmit the CD by mail:
 - a. Using a sealed opaque envelope or wrapping and mark the envelope or wrapping with the recipient's address, return address and the words "TO BE OPENED BY ADDRESSEE ONLY".
 - b. Use U.S mail or any other commercial carrier services that requires the recipients signature when delivered

Follow these requirements starting immediately. For more information on the REMS database and reporting radiation exposure records, visit the web site at:

<http://www.hss.energy.gov/csa/csp/rem/>