

12/10/2009

To: NOAA Controlled Technology Coordinators

Subject: DOC PII Policy and Foreign National Processing

We were recently advised that the Department of Commerce Office (DOC) of the Chief Information Officer (OCIO) issued a new policy on the electronic transmission of sensitive and non-sensitive Personally Identifiable Information (PII). The policy helps DOC employees distinguish between sensitive and non-sensitive PII and determine which PII may be transmitted electronically. According to the policy, electronic transmission of *sensitive* PII must be "...protected by secure methodologies such as encryption,..." Therefore, NOAA sponsors of foreign nationals (FN) *may* need to change how they transmit foreign national visitor data to the Office of Security (OSY) servicing security offices (SSO).

DOC OCIO has confirmed that several categories of the required foreign national visitor data, such as date of birth, country of birth, passport numbers, etc..., are categorized as sensitive PII. We encourage you to review the new policy and consult with your SSO to determine the preferred method of transmission of your FN PII.

We've discussed this policy with DOC and NOAA CIO to determine the options of secure transmission available to NOAA sponsors that meet the policy's standards for transmitting sensitive PII.

NOAA CIO advised that they are working with the Line/Staff Offices to acquire a new encryption tool in the coming months. They still need to conduct a needs assessment to determine the users. We reminded them to consider NOAA sponsors of foreign nationals, and we encourage you to speak with your Line/Staff OCIO to see if you would be eligible to receive an account.

Meanwhile, in the interim, both DOC and NOAA CIO recommend the following options:

- NOAA sponsors may send sensitive PII in attached encrypted Adobe documents via email (consult with your CIO's office for assistance).
- NOAA sponsors may fax the sensitive PII if they call the servicing security office to ensure that someone is available to receive the information.

The Appendix B, Endorsement Supplement (ESF), and Deemed Export Foreign National List do not contain sensitive PII, and thus there is no requirement to change to the method of transmission of these documents. There is also no change to requests processed through the Foreign National Registration System (FNRS).

The new policy can be reviewed at this address:

http://ocio.os.doc.gov/ITPolicyandPrograms/IT_Privacy/PROD01_008240

Thank you very much,