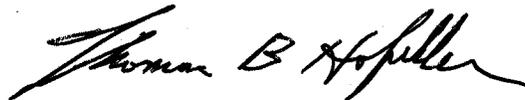


For: FSA Employees

**Requirements for Shipping Personally Identifiable Information (PII)
Through Physical Transportation Systems**

Approved by: Associate Administrator for Operations and Management



1 Overview

A Background

A comprehensive review:

- was conducted to determine the best practices, processes, and procedures for moving PII through the physical transportation systems
- focused on internal (intra-facility) and external (Federal Express (FedEx), United Parcel Service (UPS), and United States Postal Service (USPS)) delivery systems.

Note: Physical transportation is any non-electronic method of moving information through a shipping or delivery system.

B Purpose

This notice:

- implements new FSA requirements for shipping PII through both internal and external physical transportation systems
- obsoletes Notices AS-2131 and AS-2137.

C Contacts

If there are questions about this notice, contact John W. Underwood, Chief, MSD, Kansas City Administrative Services Branch, Information Management Section by e-mail to john.underwood@kcc.usda.gov or by telephone at 816-926-6992.

Disposal Date	Distribution
June 1, 2008	All FSA employees; State Offices relay to County Offices

2 PII

A Definition

PII is any information about an individual that is maintained by an agency, including, but **not** limited to; education; financial transactions; medical, criminal, or employment history; and information that 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 that is linked or linkable to an individual.

B Determining PII

Offices shall determine whether information to be shipped contains PII.

Important: Because of the complexity of the issues involved, the sending office is encouraged to seek advice, guidance, and assistance from their Freedom of Information Act/Privacy Act Service Center that can be found at http://www.fsa.usda.gov/Internet/FSA_File/foiaservicecenters.pdf.

C Data Types

The comprehensive review identified a core list of PII data types. The following table serves as a quick reference guide for identifying the most common PII data types currently moving through physical transportation systems.

Note: The core list **must not** be viewed as encompassing all PII data types. If the information being shipped contains **any** of the data types listed, the **entire** shipment shall be considered to be PII.

Item	Data Type
1	Social Security Number
2	Financial Information Examples: Bank account numbers/information, financial transaction histories, credit reports/credit worthiness information, credit/debit card numbers, and personal ID numbers.
3	Tax Information
4	Date of Birth
5	Loan/Loan Application Information

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2 PII (Continued)

C Data Types (Continued)

Item	Data Type
6	Personal Contact Information Examples: Home address, telephone number, and e-mail address.
7	Medical Information (Including disability information and sick leave usage.)
8	Driver's License Number
9	Producer Acreage Information
10	Producer Head of Livestock Information
11	Employee/Producer Racial Identity Information
12	Employee/Producer Investigator Information
13	Employee Disciplinary Information
14	Insurance Information
15	Legal/Lawsuit Information
16	Agency Internal Work Product Examples: Internal personnel rules and practices; privileged interagency or intra-agency memorandums or letters; and State, County, Field, or National Office correspondence.
17	Procurement/Contract Information and/or Information on Other Contractors/Potential Contractors
18	Information on Individuals or Organizations About Whom the USDA Keeps Information
19	USDA Proprietary Documentation/Materials Examples: Flow charts, codes, software, computer instructions, techniques, models, information, and diagrams.
20	Private Agency Internal Trade Secrets, Business Records, and/or Marketing Information

3 Physical Transportation Procedures

A Shipment Approval Process

A shipment of PII by a physical transportation system indicates that a manager or designated representative (individual authorized by management to approve entry of PII into a physical transportation system) from the sending organization:

- is fully aware of the actual PII contained within the shipment
- approves entry of PII into the physical transportation system
- accepts full responsibility and accountability for entering PII into the internal or external physical transportation system
- has ensured that PII in electronic format has been encrypted, providing the data system allows encryption.

Important: The decryption key shall:

- be provided by telephone **after** the receiver confirms receipt of the shipment
- **not** be:
 - included in the same shipment
 - provided by e-mail.

Note: AD-2059 (Exhibit 1):

- shall be completed as required
- is for use with any mailroom, such as the mailrooms in the National Office and Kansas City, that require signed AD-2059's to enter PII and/or non-PII into the physical transportation system
- is available at <http://intra3.fsa.usda.gov/dam/ffasforms/forms.html>.

B Shipment Preparation Requirements

The following provides requirements for PII shipments. PII shipments shall be:

- sufficiently sealed to prevent inadvertent opening
- sealed in a manner that signs of tampering will be easily visible.

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3 Physical Transportation Procedures (Continued)

B Shipment Preparation Requirements (Continued)

Sending office, or designated representative, shall do the following.

Step	Action
1	<p>Seal PII items in an opaque envelope, package, or box (new, unused envelopes, packages, or boxes are preferred).</p> <p>Note: Certain envelopes, packages, or boxes are in good enough condition to be used on more than 1 occasion. However, reusing envelopes, packages, or boxes poses a risk. The sender shall ensure that:</p> <ul style="list-style-type: none"> • any reused envelope, package, or box is in such condition that it will remain intact during the physical transport process • the package is proper sealed when reusing an envelope, package, or box.
2	<p>If items being transported have the potential to break the first sealed PII envelope, package, or box (such as objects that are bulky/irregularly shaped, have sharp edges, easily shift inside the envelope, package, or box, and over-stuffed envelopes, packages, or boxes, etc.), the first sealed PII envelope, package, or box shall be placed inside a second, new (unused) opaque envelope, package, or box and sealed again (double-sealed).</p> <p>The second opaque envelope, package, or box may be provided by the shipping vendor (such as FedEx or USPS).</p> <p>Note: Electronic media containing PII (such as System 36/AS 400 data tapes, DVD's, CD's, etc.) shall be double-sealed before being sent by a physical transportation system.</p>
3	<p>Label the first (and second when applicable) envelope, package, or box with sender's and recipient's address.</p> <p>Note: Under no circumstances should the shipment be externally labeled on the first or second envelope, package, or box to indicate or identify that the shipment contains PII.</p>
4	<p>Electronic media containing PII (such as System 36/AS 400 data tapes, DVD's, CD's, etc.) shall be individually labeled as U.S. Government Property. Affix a label stating "U.S. Government Property. If Found Return To (sender's address)."</p>
5	<p>Label each individual box bound for FRC as U.S. Government Property. Affix a label stating "U.S. Government Property. If Found Return To (sender's address)."</p>

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3 Physical Transportation Procedures (Continued)

C Approved Shipment Methods

The following table provides approved PII shipping methods.

Method	Instruction
Internal (Intra-Facility)	<p>Deliver to single, stand-alone facilities and facilities that are in close physical proximity to each other.</p> <p>Example: Compound-style buildings or facilities in the same city that are supported by the same mailroom.</p>
Hand-Carried	Sender shall take information directly to receiver.
Courier Service	Courier service shall hand-carry information directly to receiver.
Mailroom	<p>PII may be placed into the internal physical transportation system.</p> <p>Important: Notification of Shipment: When using a mailroom, the sender shall notify receiver by e-mail to expect PII delivery.</p> <p>Follow-up Contact: When using a mailroom, sender shall contact receiver by e-mail on, but not to exceed 1 workday after, expected delivery date to confirm PII has successfully reached the intended destination.</p>
External	<p>PII shall be shipped externally using a transport method that provides:</p> <ul style="list-style-type: none"> • for a positive chain of custody • the ability to track pickup, receipt, transfer, and delivery. <p>Note: Approved external shipment methods are:</p> <ul style="list-style-type: none"> • FedEx • UPS • USPS. <p>Exception: Physically transported letters and large envelopes (such as Transaction Statements, IRS-1098's, CCC-1099's or IRS-1099's) shall be accomplished using standard First-Class Mail® offered by USPS. If the envelope meets the criteria set forth by USPS, as follows, the envelope (not package or pouch) containing PII can be sent by USPS First-Class Mail®:</p> <ul style="list-style-type: none"> • First-Class Mail letters are small rectangular mail pieces at least 3-1/2 inches high x 5 inches long x .007 inch thick, no more than 6-1/8 inches high x 11-1/2 inches long x 1/4 inch thick, with a maximum weight of 3.5 ounces • First-Class Mail large envelopes are at maximum 12 inches high by 15 inches long by 3/4 inches thick.

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3 Physical Transportation Procedures (Continued)

C Approved Shipment Methods (Continued)

Method	Instruction
FedEx	<p>USDA has negotiated a Blanket Purchase Agreement (BPA) with FedEx. Account holders will automatically receive discounts.</p> <p>The FedEx BPA has 4 shipment options available. The option selected will depend upon the delivery speed required. The 4 options are:</p> <ul style="list-style-type: none">• FedEx 2Day®• FedEx Express Saver® (3 day)• FedEx Priority Overnight®• FedEx Standard Overnight®.
UPS	<p>UPS has 1 delivery option available for PII shipments. The sender shall specify UPS Other Accessorial Service, “Delivery Confirmation – Signature Required”.</p> <p>Note: Currently, the additional charge for UPS Delivery Confirmation – Signature Required option is \$2.25 per package.</p>
USPS	<p>USPS has 3 shipment options. The option selected will depend upon the weight of envelope and delivery speed required. The 3 options are:</p> <ul style="list-style-type: none">• Express Mail® (overnight)• First-Class Mail® with Certified Mail (3 day); for envelopes weighing 13 ounces or less• Priority Mail® with Certified Mail (2 day); for envelopes weighing 14 ounces or more.

D Shipment Cost Analysis

The sending office shall be responsible for performing a cost analysis to determine, and then use, the most cost effective method for shipping PII through the approved physical transportation shipment methods.

3 Physical Transportation Procedures (Continued)

E Using FedEx Method

Cost analysis indicates that, because of the FedEx BPA, FedEx is the preferred method for external shipments. Activate BPA between USDA and FedEx by calling 800-645-9424 and providing office's FedEx account number. FedEx will discuss options for making payment.

If an office does **not** have a FedEx account, an account can quickly be established by contacting Monica Fleischmann, FedEx Worldwide Account Manager, Government Sales at either of the following:

- telephone at 703-866-2014
- cell phone at 703-608-9264.

Note: FedEx, UPS, and USPS are the **only** approved methods for physically transporting PII. For non-PII data, it is up to individual offices to determine the most cost-effective method for sending non-PII through a physical transportation system. However, because of the favorable terms of the FedEx BPA, offices are encouraged to research the possibility of reducing costs by using the FedEx BPA for non-PII shipments.

4 Physical Transportation of System 36/AS 400 Data Tapes

A System 36/AS 400 Data Tape Shipment

FedEx shall be used for shipping System 36/AS 400 data tapes. UPS and USPS shall be used for the shipping System 36/AS 400 data tapes **only** if FedEx is unavailable.

B Preparing System 36/AS 400 Data Tapes for Shipment

Before shipping System 36/AS 400 data tapes, offices shall ensure that:

- the appropriate Volume Table of Contents (VTOC) listing has been developed and has been included in the package containing the System 36/AS 400 data tape
- the System 36/AS 400 data tape and VTOC listing has been placed in a new (unused) opaque envelope, package, or box. Reusing envelopes, packages, or boxes is **not** authorized when shipping System 36/AS 400 data tapes
- shipment has been double-sealed and both envelopes, packages, or boxes have been labeled with the sender's and recipient's address
- the sender notifies the receiver to expect delivery of the System 36/AS 400 data tape; an expected delivery date shall be provided
- the sender contacts the receiver on, but **not** to exceed 1 workday after, the expected delivery date to confirm the System 36/AS 400 data tape has successfully reached the intended destination.

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4 Physical Transportation of System 36/AS 400 Data Tapes (Continued)

C Shipping System 36/AS 400 Data Tapes to Kansas City

Use the following address when shipping System 36/AS 400 data tapes to Kansas City:

Robert Bonacker
USDA-FSA-IPUSO
Beacon Facility – Mail Stop 8420
9240 Troost Ave
Kansas City MO 64131-3055
Telephone: 816-926-1179.

AD-2059, Identification and Approval of Information Shipped Via FedEx or USPS

AD-2059 may be completed for PII shipments.

AD-2059 <small>(08-01-07)</small>		U. S. DEPARTMENT OF AGRICULTURE	
IDENTIFICATION AND APPROVAL OF INFORMATION SHIPPED VIA FEDEX OR USPS			
INSTRUCTIONS: If there is a Federal Mailroom / Centralized Shipping Facility at your location, outgoing Federal Express or USPS items may be processed through that facility. This form may be used to enter shipments into the Physical Transportation System. Shipments shall be double sealed (when required). If the item is too large for an envelope/pouch, the package shall be appropriately banded or secured to prevent the contents from falling out during shipment.			
1. REQUESTER (Type or Print First and Last Name)		2. AGENCY <input type="checkbox"/> FAS <input type="checkbox"/> FSA <input type="checkbox"/> NRCS <input type="checkbox"/> OCIO <input type="checkbox"/> RD <input type="checkbox"/> RMA <input type="checkbox"/> Other:	
3. FACILITY LOCATION (City/State)		4. ORGANIZATIONAL ENTITY (Show State/county name or provide full acronym, highest to lowest structure levels; i.e., FSA-ITSD-ADC-PARMO)	
5. ROOM NO., CUBE ASSIGNMENT, OR MAIL STOP CODE (As applicable)		6. PHONE NO. (Include Area Code and Extension)	
7. IDENTIFICATION AND TYPE OF INFORMATION BEING SHIPPED			
7a. DESCRIPTION OF ITEM(S) BEING SHIPPED:			
7b. Does the shipment contain Personally Identifiable Information (PII)? No <input type="checkbox"/> Go to Item 7d. Yes <input type="checkbox"/> Complete blocks 7c and 7d.			
7c. STEPS TAKEN TO PROTECT THE DATA (Check as applicable) <input type="checkbox"/> Electronic data has been encrypted <input type="checkbox"/> Shipment(s) properly and securely packaged (double sealed) <input type="checkbox"/> Other (Specify):		7d. YOUR E-MAIL ADDRESS NOTE: Enter to activate the FedEx/USPS online tracking system (PII data) <u>or</u> to receive immediate e-mail notification upon delivery.	
8. SHIPPING ADDRESS and SERVICE REQUESTED: DO NOT use Post Office (PO) Box numbers.			
8a. COMPANY NAME or OFFICE/DIVISION			
8b. ATTENTION (Include Individual's Name and Stop Code, as Applicable)			
8c. BUILDING or ROOM NO.			
8d. STREET ADDRESS			
8e. CITY, STATE, ZIP			
8f. DESTINATION PHONE (Include Area Code and Extension)			
8g. REQUIRED DELIVERY SERVICE (Check one):			
<input type="checkbox"/> FedEx Priority Overnight® (delivery by 10 a.m. the next day)		<input type="checkbox"/> USPS Express Mail® (overnight)	
<input type="checkbox"/> FedEx Standard Overnight® (delivery by 3 p.m. the next day)		<input type="checkbox"/> USPS Priority Mail® with Certified Mail Option (2-day service)	
<input type="checkbox"/> FedEx 2Day® (2-day service)		<input type="checkbox"/> USPS First-Class Mail® with Certified Mail Option (3-day service)	
<input type="checkbox"/> FedEx Express Saver® (3-day service)			
<input type="checkbox"/> FedEx Saturday Delivery (available only with FedEx Priority Overnight® and FedEx 2Day®)			
8h. JUSTIFICATION FOR USING FEDEX/USPS SHIPPING			
9. CERTIFICATION AND APPROVAL OF SHIPMENT BY MANAGER OR DESIGNATED REPRESENTATIVE			
By signing, I certify that I am aware of the contents of the shipment and am aware of the shipment's Personally Identifiable Information (PII) status (if applicable) and approve the shipment for entry into the Physical Transportation System.			
9a. NAME (Type or Print)		9b. TITLE	
9c. SIGNATURE		9d. DATE	
10. TO BE COMPLETED BY SHIPMENT PROCESSOR			
10a. NAME (Type or Print)		10b. STAMP DATE HERE	
10c. AFFIX FEDEX/USPS TRACKING NO. STICKER(S) HERE			