

State of Vermont
Agency of Natural Resources

Financial Process:	AID Procedure on Security of Personal Identifiable Information (PII)	Issue Date: Number:	December 24, 2018 1
Topic:	Internal Controls	Effective Date:	1/1/2019
Applicable To:	Department of Environmental Conservation (DEC)	Page:	1 of 1
Prepared / Revised by:	Maria Davies	Revision Date:	

Procedure Objective

The objective of this procedure is to ensure that all staff within Financial Operations are aware of what is deemed as Personal Identifiable Information (PII) according to Vermont statute, and how to ensure that PII is handled in a secure manner while performing the functions that require regular use of PII. Through our daily work there are instances, when we collect, and maintain an individual's personal identifiable information. We therefore have a responsibility to protect that information from unauthorized access and/or misuse.

Statue: <https://legislature.vermont.gov/statutes/fullchapter/09/062>

Definitions:

Personal Identifiable Information (PII): For purposes of this policy, “personally identifiable information” means an individual's first name or first initial and last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted or redacted or protected by another method that renders them unreadable or unusable by unauthorized persons:

- Social Security number;
- motor vehicle operator's license number or nondriver identification card number;
- financial account number or credit or debit card number, if circumstances exist in which the number could be used without additional identifying information, access codes, or passwords;
- account passwords or personal identification numbers or other access codes for a financial account.

Procedures:

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The handling of PII, regardless of format is restricted to authorized staff only. PII may be collected in various ways including on a paper form, over a secure FTP site or submitted through a State of Vermont email account. Financial Operations shall only collect personally identifying information when it is required by law or necessary for the implementation of a program and will follow the following guidelines.

- PII must be limited in its collection to the extent possible. A W-9 form, from an individual or a vendor, and will be deleted from the computer as soon as the Vendor information in Vision is successfully added or updated.
- Sending a W-9 by email will not be recommended and will include a warning to the sender that if it is not a safe method of transmission. We will not ask anyone to send a W-9 via email. We can offer the option to fax or mail it in and to advise if it is sent via email that it will not be a secure transmission.
- PII information is not allowed to be loaded onto a personal computer or on a removeable disk drive (USB or flash drive).

Use of secure e-mail transmission of PII is always required . If transmitting PII internally through the State of Vermont email system, the information is secure. If transmitting to an email address outside of the State of Vermont email system, the email shall be sentwith **[SECURE]** in the subject line of the e-mail. PII records collected by Financial Operations shall be destroyed once the need for the information has been satisfied.

- All PII collected must be stored in a locked filing cabinet where access is limited to persons who must have access to the information to perform their job duties;
- Or, the information can be stored in a state-approved networked location such as ANR file server or ANR SharePoint.

What to do if think PII has been compromised

If an employee has reason to believe that PII information has been breached, the employee should **immediately** notify their supervisor. If the breach is computer related, an IT work order should be entered by the supervisor and the Division Director and Commissioner’s Office should be notified immediately.

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Fraud or Theft - Upon suspicion of fraud or theft, the appropriate personnel will be notified immediately.

Administration & Innovation Division (AID) – Tracy LaFrance, Department
Financial Director 802-498-7074

Vermont State Auditor’s Office - Fraud Hot Line 1-877-290-1400

<http://auditor.vermont.gov/reports/whistleblower>

Whistleblower can be anonymous.

Vermont State Police. 802-241-5000

Notices

- This policy is intended to support the Agency of Natural Resources internal control environment.
- In consideration of this policy, the objective should be on adherence and not on rationalizing ways and means for circumvention.
- Nothing in this document shall limit or supersede any applicable Federal or State laws, statutes, bulletins, or regulations