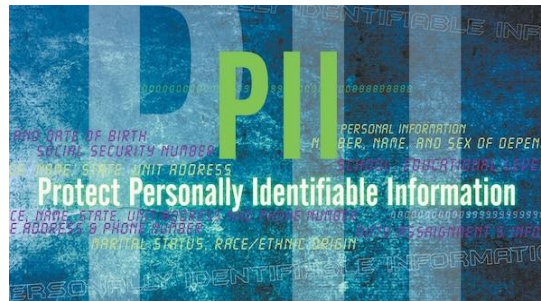


# GAO Topic of the Month - March 2021

## AFIS Attachments & Personally Identifiable Information (PII)

### INTRODUCTION

The Topic of the Month is being provided as a resource to agencies and employees to better understand the requirements, responsibilities and expectations that come with certain processes, positions, and functions. The goal is to ensure that agencies have the knowledge to consistently comply with State and Federal law, regulations and guidelines, while reducing the risk of fraud, waste and abuse. This month's topic is *Attachments & Personally Identifiable Information (PII) in AFIS*. If there are any topics that your agency is struggling with and/or would like additional information on, please contact your GAO Liaison. GAO is here to help!



### WHAT IS PERSONALLY IDENTIFIABLE INFORMATION (PII)?

PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many different types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified using information that is linked or linkable to said individual. In performing this assessment, it is important to recognize that information that is not PII can become PII whenever additional information is made publicly available — in any medium and from any source — that, when combined with other information to identify a specific individual, could be used to identify an individual (e.g., Social Security Number (SSN), name, date of birth (DOB), home address, personal email).

### WHY SHOULD THIS INFORMATION BE REDACTED FROM ATTACHMENTS IN AFIS?

AFIS attachments are accessible by many different people and are subject to public information requests. PII information such as social security numbers and date of birth are usually not required for financial transactions, although they may be part of supporting documentation. While supporting documentation is important and should be attached, all attachments should be reviewed for appropriateness. Information that is PII and not necessary, should be redacted. Remember, that those who enter and attach supporting documentation and those who review and approve transactions have a responsibility to review the document and attachments to determine if any PII information is included and whether or not any information should be redacted before submitting or approving the document. While not all PII may be able to be removed or redacted, the use, collection, and retention of PII should be minimized to what is strictly necessary to accomplish the business purpose and scope of work.

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### WHAT ARE SOME EXAMPLES OF SENSITIVE INFORMATION?

- Personally Identifiable Information includes:
  - Full name, maiden name, mother's maiden name, or alias
  - Social security number (SSN), passport number, driver's license number, taxpayer identification number, patient identification number, financial account number, or credit card number
  - Personal address information, street address, or email address
  - Personal telephone numbers
  - Personal characteristics: photographic images (particularly of face or other identifying characteristics), fingerprints, or handwriting
  - Biometric data: retina scans, voice signatures, or facial geometry
  - Information identifying personally owned property: VIN number or title number
  - Asset information: Internet Protocol (IP) or Media Access Control (MAC) addresses that consistently link to a particular person
- Financial Account Data
  - Checking, saving, securities, retirement account numbers
  - Routing and transit account numbers
- Payment Card Industry Data
  - Cardholder data
  - Credit, charge, debit card numbers
  - Electronic payment accounts, e.g. PayPal, Venmo
- Healthcare/Medical Information (may also be subject to additional HIPAA requirements)
- Federal Taxpayer Information
- Criminal Justice Information, including hearings
- Education Records (may also be subject to additional FERPA requirements)
- The following examples on their own do not constitute PII as more than one person could share these traits. However, when linked or linkable to one of the above examples, the following could be used to identify a specific person:
  - Date of birth
  - Place of birth
  - Business telephone number
  - Business mailing or email address
  - Race
  - Religion

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- Geographical indicators
- Employment information
- Medical information
- Education information
- Financial information

### WHAT ARE OTHER RESOURCES FOR THIS TOPIC?

- [SAAM 0555 - Transmission and Storage of Confidential and Sensitive Information](#)
- Arizona Statewide Information Security Statewide Policy (8110) Data Classification located at: [https://aset.az.gov/sites/default/files/P8110%20Data%20Classification\\_Sept2018\\_0.pdf](https://aset.az.gov/sites/default/files/P8110%20Data%20Classification_Sept2018_0.pdf)
- [Rules and Policies - Protecting PII - Privacy Act](#)
- [GSA Rules of Behavior for Handling Personally Identifiable Information \(PII\)](#)
- How to redact information:
  - [Redacting Private Information in PII Documents](#)
  - [How to Redact - New CAED](#)
  - [Guidance on Redacting Personal Data Identifiers in Electronically Filed Documents](#)
  - Check with your agency's IT Department

### IN CONCLUSION

It is important that every person who enters, approves, or has oversight over AFIS transactions and attachments are reviewing all the transactions and attachments for PII and determining what is and is not appropriate. We have noticed several transactions containing PII information which is not necessary for the transaction and where different information should be attached or certain data redacted. Please make sure you and those at your agency are reviewing all AFIS documents and the attachments for appropriateness before the document is processed.