

Brief: PII in PEPC

August 29, 2023

The PEPC application stores personally identifiable information (PII) and therefore requires that application account holders annually complete both Information Management Training (IMT) and Role-Based Privacy Training (RBPT).

During the winter of 2022, PEPC's System of Records Notice (SORN) was updated.

Definition of SORN: *"A system of records is a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifier assigned to the individual. The Privacy Act requires each agency to publish notice of its systems of records in the Federal Register. This notice is generally referred to as a System of Records Notice (SORN)."*

- **Types of PII covered by the PEPC SORN**

- "These records may include name, home or business address, home or business telephone number, home or business email address, organization affiliation, correspondent identification number, project number, and unique correspondence identification number for each correspondence record received."
- This information is associated with PEPC User Profiles, IDT members, and public commenters

- **Examples of PII not covered by the PEPC SORN**

- SSN, Tax ID #, payment/account information, etc.
- PII should not be entered into fields on PEPC pages/forms
- PII should not be uploaded to PEPC in files - examples include:
 - Special Use Permits (SUPs) - applications, permits, or supporting docs
 - research permits
 - personnel forms
 - tax forms

Questions to consider

- Does it really need to be part of the project?
- Can you link to a file in a secure location/appropriate system (e.g., link to a research permit in the Research Permit Reporting System [RPRS])?
- Can you reference an identifier for the related file instead of uploading?
- If you absolutely must upload a file with PII, then you must redact PII if it's not in the scope of PEPC's SORN.