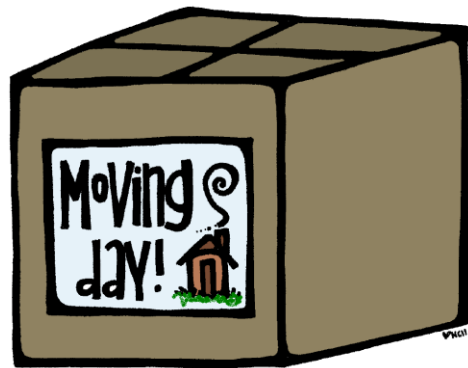The Department of Commerce (DOC) is committed to safeguarding personal privacy. Additional direction is provided to ensure the safeguarding of sensitive PII and BII during office moves, in partnership with the Department's Move Instruction Guide located at: https://renovation.my.commerce.gov/sites/default/files/images/move_instruction_guide_january2015.pdf.

KEY PRIVACY LAWS AND OTHER GUIDANCE

The Department of Commerce adheres to federal privacy laws and guidance to ensure that the collection, use, and maintenance of sensitive information, such as personally identifiable information and business identifiable information, is properly safeguarded.

Privacy Regulations:

- Freedom of Information Act (FOIA) – 5 U.S.C. § 552

- Privacy Act of 1974 – 5 U.S.C. § 552a

- The E-Government Act of 2002

- Trade Secrets Act – 18 U.S.C. § 1905

- Federal Information Security Management Act (FISMA) of 2002 – 44 U.S.C. § 3541

- Paperwork Reduction Act of 1995 (PRA)

Guidance:

- OMB Memorandums M-03-22, M-06-15, M-06-16, M-06-19, M-07-16, M-10-23

- Department of Commerce IT Privacy Policy

Office of Privacy & Open Government
Privacy Program

Department of Commerce's Quick-Start Guidance for Moving Sensitive Personally Identifiable Information (PII) and Business Identifiable Information (BII)

The Privacy Act of 1974, 5 U.S.C. § 552a (e)(10), and Office of Management and Budget Memorandum (OMB) M-07-16, Attachment 1 (A)(b) requires agencies to establish appropriate administrative, technical, and physical safeguards to insure the security and confidentiality of records and to protect against any anticipated threats or hazards to their security or integrity which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom information is maintained.

Office of Privacy and Open Government

Email: cpo@doc.gov

WHAT TO SECURE WHEN MOVING

The following types of PII are considered sensitive when associated with an individual, and secure methods must be employed when packing, moving, and unpacking this data:

- Social Security Number (SSN), including truncated form
- Place of birth
- Date of birth
- Mother's maiden name
- Biometric information
- Medical information, except brief references to absence from work
- Personal financial information
- Credit card or purchase card account numbers
- Passport numbers
- Potentially sensitive employment information, e.g., personnel ratings, disciplinary actions, and results of background investigations
- Criminal history
- Any information that may stigmatize or adversely affect an individual

BII consists of information that is defined in the Freedom of Information Act as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." Commercial or financial information is considered confidential if disclosure is likely to cause substantial harm to the competitive position of the person from whom the information was obtained. Examples of BII include:

- Financial information provided in response to requests for economic census data
- Business plans and marketing data provided to participate in trade development events
- Commercial and financial information collected as part of export enforcement actions
- Proprietary information provided in support of a grant application or related to a federal acquisition action
- Financial records collected as part of an investigation

HOW TO PACK PLASTIC MOVING CRATES/CARDBOARD MOVING BOXES

- Inventory documents/media containing PII/BII to be packed in the plastic moving crates/cardboard moving boxes
- Request numbered security seals (zip ties with serial numbers) from your Bureau Move Coordinator in order to secure the plastic moving crates
- Create an electronic list of items inventoried and serial numbers of security seals, and store electronically with access only to authorized personnel who have a "need to know"
- Place documents/media containing PII/BII in the plastic moving crates/cardboard moving boxes
- Place a piece of paper with your name, program, new room number, and serial number of security seal (if applicable) on top of contents before securing the plastic moving crates/cardboard moving boxes to assist with identifying who owns the materials if a label detaches during transit
- Secure the plastic moving crates containing PII/BII with numbered security seals and/or secure the cardboard moving boxes containing PII/BII with packing tape
- Attach the color-coded labels to the short end of the plastic moving crates/cardboard moving boxes without disclosing contents
- Store packed plastic moving crates/cardboard moving boxes containing PII/BII in a secure location until they are moved
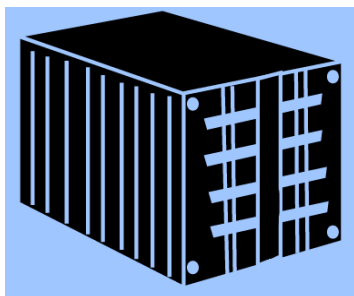
HOW TO MOVE PLASTIC MOVING CRATES/CARDBOARD MOVING BOXES

- Identify two escorts (primary and secondary) to remain with the plastic moving crates/cardboard moving boxes while being moved to the new office location
  - One escort needs to be present throughout the duration of the move
- Store packed plastic moving crates/cardboard moving boxes containing PII/BII in a secure location after the move

UNPACKING PLASTIC MOVING CRATES/CARDBOARD MOVING BOXES

- Inspect plastic moving crates/cardboard moving boxes to ensure the following and report any discrepancies to your Bureau Move Coordinator immediately
  - Numbered security seals (zip ties with serial numbers) are not broken/missing
  - Serial numbers of security seals match your records
  - Packing tape has not been tampered with
- Unpack plastic moving crates/cardboard moving boxes within the first week of the move, but no later than the following Monday
  - Continue to store packed plastic moving crates/cardboard moving boxes containing PII/BII in a secure location
- Verify contents of plastic moving crates/cardboard moving boxes using the inventory list to confirm delivery and report any discrepancies to your Bureau Move Coordinator immediately
- Place unpacked documents/media containing PII/BII in a secure location
- Place emptied plastic moving crates/cardboard moving boxes in the main corridor for collection by movers

WE'RE MOVING!