

MEMORANDUM

[DATE]

TO: Department of Human Resources Development

FROM: Information Privacy and Security Council

SUBJECT: Recommendations Regarding the Internal Handling of Personally Identifiable Information

The purpose of this memorandum is to convey the recommendations of the Information Privacy and Security Council (IPSC) regarding the internal handling of personally identifiable information (PII) by government agencies.

Administratively attached to the Department of Accounting and General Services, the IPSC was established by Act 10, SSLH 2008 (codified as [HRS section 487N-5](#)) to develop guidelines to be considered by government agencies in deciding whether, how, and when a government agency shall inform affected individuals of the loss, disclosure, or security breach of personal information that can contribute to identify theft. The guidelines provide a standardized, risk-based notification process in the instance of a security breach.

Over the course of 2016, the IPSC further deliberated on the issue of internal handling of PII in the workplace and endeavored to identify practices that may present a potential risk for the inadvertent exposure of PII (or related personal health information) to unauthorized staff. As adopted [unanimously, if so] on [DATE], the IPSC respectfully offers the following recommendations for consideration by DHRD to incorporate in State policies and procedures:

- Best efforts should be undertaken by all departments to ensure only appropriate and authorized staff view and/or handle employee health information. This is typically human resources and direct supervisors, as necessary.
- All employee health information must be secured during transit. When transporting hard-copy materials within the office, said materials must be placed in an envelope labeled with the employee's name. If transported between office locations, the envelope must be marked "Confidential."
- The practice of attaching doctors' notes to leave request forms (e.g., G-1 form) should cease, with the exception of family and medical leave and/or workers' compensation records maintained by authorized human resources personnel. Alternatively, it is sufficient for a supervisor to verify that a doctor's note was presented by the employee (e.g., G-1 form is revised so the supervisor has the option to select "Doctor's note presented on [date]" without attaching the actual note).

The IPSC is available to work in collaboration with DHRD on this issue. Please note that this memorandum refers to hard-copy documents only, as the IPSC continues to deliberate on the matter of PII contained on electronic devices.

Should you have questions or request assistance, please contact IPSC Chair Vincent Hoang, Chief Information Security Officer, Office of Enterprise Technology Services, at vincent.hoang@hawaii.gov or 586-1930 ext. 752; or Keith DeMello, ETS Senior Communications Manager, at keith.demello@hawaii.gov or 586-1866.