PII Compliance Project
Project description

<u>Problem statement</u>
The City of Portland is required to appropriately manage all personally identifiable information that is considered "protected". At present there is no clear and comprehensive direction to City staff about what information is protected, how to assess and manage the protected information that bureaus current possess, or how to revise business processes so that, going forward, bureaus minimize the intake of PII and properly manage the PII that they do collect.

One of the institutional challenges in the City of Portland is that no one specific bureau has responsibility for directing and ensuring the City's compliance with PII. At the same time, many OMF bureaus play a role including BTS as custodian of electronic information, and BHR and BRFS as bureaus that collect and manage significant amounts of PII. The City Attorney is an essential advisor regarding the City's PII compliance and the City Auditor's Office a key role as the City's archivist and records retention advisor.

<u>Approach</u>
The City will be better served by a coordinated Citywide approach to move into PII compliance than what would happen if bureaus were left to individual determine what needs to be done, how and when (and if) to do it.

The effort for the City to become PII compliant is likely a multi-year endeavor with two distinct components: addressing the existing inventory of PII already in the City's possession and revising and implementing business processes so that future PII collected by the City is optimally managed.

Given the effort and time that will be needed to move to compliance, the City should prioritize its efforts based on the degree of risk or exposure represented by the different types of PII in the City's possession.

The City should establish a work group to provide directions and guidance on best practices to City bureaus. Some outcomes will be policies (requirements) while others will be tools and best practices (options) for bureaus to use to move into PII compliance.

<u>Desired outcomes and deliverables</u>
1. Citywide policy for bureaus to be responsible for managing PII. See CMP 2.01.
2. Risk identification tool to help bureaus ensure they are focusing on the right stuff first.

3. Practical, effective and efficient mechanism(s) by which bureaus are held accountable for moving into compliance with PII. (It is *not* an option not to move to compliance).
4. Specific guidance to bureaus to address issues relating to existing and future PII. Examples of best practices/useful tools for bureaus include:
   - How to identify the PII already in your bureau's possession
   - How to find PII you have – in paper, on your web site, in your electronic information
   - Common/current practices that are not PII compliant (e.g. open-air shredders)
   - Best practices for managing PII in paper form
   - Best practices for examining and revising business processes to minimize PII intake, and maximize appropriate management and destruction of PII in the City's possession.
   - Naming conventions/standards for PII in electronic form

PII Compliance work group

Celia Heron, CAO's Policy team
Diana Banning, City Auditor's Office, Archivist
Jenifer Johnston, City Attorney's Office
Simon Whang, City Attorney's Office
Christopher Paidhrin, Bureau of Technology Services

Ad hoc partners:

Bureaus likely to have significant amounts of PII

- OMF
  - Bureau of Human Resources
  - BRFS – Accounting
  - BRFS – Procurement
  - BRFS – Revenue, Terri Williams
  - BRFS – Treasury
  - BIBS – Risk Management
- Water Bureau
- Housing
- Parks